

## EXHIBIT "M" - Mahoney Deposition

Meagan Mahoney  
November 18, 2020

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

\* \* \* \* \*

JOSEPH PAPIN,

Plaintiff,

v.

CASE NO.:

3:17-CV-763-CWR-FKB

UNIVERSITY OF MISSISSIPPI MEDICAL  
CENTER; DR. LOUANN WOODWARD, in  
her official capacity; and  
DR. T. MARK EARL, in his  
individual capacity,

Defendants.

\* \* \* \* \*

Videoconference Deposition of  
MEAGAN MAHONEY, MD, taken  
on November 18, 2020, commencing  
at approximately 1:59 p.m.

A P P E A R A N C E S

ALL APPEARANCES BY VIDEOCONFERENCE

FOR THE PLAINTIFF:

C. RYAN MORGAN, ESQUIRE  
rmorgan@forthepeople.com

AND

JOLIE N. PAVLOS, ESQUIRE  
jpavlos@forthepeople.com  
MORGAN & MORGAN, PLLC  
20 NORTH ORANGE AVENUE, SUITE 1400  
ORLANDO, FL 32801  
407-420-1414

FOR THE DEFENDANTS:

TOMMY WHITFIELD, ESQUIRE  
Tommy@whitfieldlaw.org  
WHITFIELD LAW GROUP  
660 LAKELAND EAST DRIVE, SUITE 200  
FLOWOOD, MS 39232  
601-863-8221

ALSO PRESENT:

JOSEPH PAPIN

COURT REPORTER:

DEBRA AMOS ISBELL, CCR,RDR,CRR - ACCR #21

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## I N D E X

DEPOSITION OF MEAGAN MAHONEY, MD - 11/18/2020

## EXAMINATION INDEX

BY MR. MORGAN	5
BY MR. WHITFIELD	140
BY MR. MORGAN	152

## EXHIBIT INDEX

## EXHIBIT

Exhibit 1	Email to Dr. Earl and Renee Greene from Dr. Mahoney, 1/10/2017 - Papin-010889-010890	21
Exhibit 2	Text message "#5" - Plaintiff-000055	29
Exhibit 3	Text message, 12/6/2016 - Plaintiff-000036	35
Exhibit 4	Text message, 12/15/2016 Plaintiff-000034	37
Exhibit 5	Text message, 12/12/2016 Papin-042489-042490	42 42
Exhibit 6	Medical record, 11/15/2016 - Papin-3072	66
Exhibit 7	Medical record, 12/9/2016 - Papin-3091-3093	69
Exhibit 8	Note in the medical records by Dr. Papin, 12/12/2016 - Papin-3344-3347	74
Exhibit 9	Note in the medical records by Dr. Papin, 12/13/2016 - Papin-3353-3355	75

1	Exhibit 10 Note in the medical records by	79
2	Dr. Papin, 12/14/2016	
	- Papin-3350-3353	
3	Exhibit 11 Note in the medical records by	80
4	Dr. Papin, 12/15/2016	
	- Papin-3355-3358	
5	Exhibit 12 Note in the medical records by	82
6	Dr. Papin, 12/17/2016	
	- Papin-3366-3368	
7	Exhibit 13 Note in the medical records by	84
8	Dr. Papin, 12/18/2016	
	- Papin-3377-3379	
9	Exhibit 14 Note in the medical records by	86
10	Dr. Papin, 12/19/2016	
	- Papin-3368-3371	
11	Exhibit 15 Note in the medical records by	86
12	Dr. Papin, 12/20/2016	
	- Papin-3372-3377	
13	Exhibit 16 Note in the medical records by	87
14	Dr. Papin, 12/21-22/2016	
	- Papin-3379-3381	
15	Exhibit 17 Note in the medical records by	87
16	Dr. Papin, 12/22/2016	
	- Papin-3382-3384	
17	Exhibit 18 Note in the medical records by	88
18	Kisha Dyse, 12/22/2016 - Papin-3095	
19	Exhibit 19 Text message, 12/22/2016 -	98
	Papin-042486	
20	Exhibit 20 Text message, 12/23/2016 -	101
21	Plaintiff-000052	
22	Exhibit 21 Note in the medical records by	105
23	Ronnie Keith Brown, 12/23/2016	
24	- Papin-3391-3396	
25		

1 (THIS DEPOSITION WAS TAKEN PURSUANT TO THE  
2 FEDERAL RULES OF CIVIL PROCEDURE. READING  
3 AND SIGNING BY THE WITNESS IS RESERVED.)  
4

5 MEAGAN MAHONEY, MD  
6 was sworn and testified as follows:

7 THE WITNESS: I do.

8 EXAMINATION

9 BY MR. MORGAN:

10 Q. Dr. Mahoney, if you could, state your full  
11 name for the record, please.

12 A. Meagan Elizabeth Mahoney.

13 Q. And where do you currently live,  
14 Dr. Mahoney?

15 A. In Columbus, Georgia.

16 Q. How long have you lived there, ballpark?

17 A. About two years.

18 Q. We met a moment ago. My name is Ryan  
19 Morgan. I represent Dr. Papin in a case he has  
20 brought against UMMC related to certain violations he  
21 is alleging.

22 Have you ever had your deposition taken  
23 before?

24 A. For this case or for anything?

25 Q. For anything.

1           A.       I think we had a meeting in 2017 regarding  
2 this, but that was it.

3           Q.       Okay. So that was the appeals hearing when  
4 you provided some testimony?

5           A.       Yes.

6           Q.       Okay. Other than that, have you ever had to  
7 provide any sort of sworn testimony like this?

8           A.       No, sir.

9           Q.       Whether it's in a deposition -- it's kind of  
10 a new thing here now doing all this by Zoom. It used  
11 to always be in person; right? But now it's by Zoom  
12 or testifying in court. Never had to do anything like  
13 that?

14          A.       No, I have not.

15          Q.       That's totally fine and very normal. But  
16 I'm sure Tommy has sort of given you a few, quote,  
17 "ground rules" that lawyers always like to recite at  
18 the beginning of depositions. But, you know, just to  
19 be sure, we do have a court reporter typing everything  
20 down. So we want to be very careful with how we  
21 communicate with each other. I'll ask questions, and  
22 then you'll answer. You're going to know halfway  
23 through my question what I'm sort of asking, but just  
24 let me finish it. That way the court reporter can  
25 type it down perfectly clearly. And then the same

1 thing for me. I'm always ready to jump in and ask you  
2 a followup question. But I have to be good about  
3 letting you finish your answer, too.

4 It may be a little obvious, but just for the  
5 record, uh-huhs, huh-uhs don't show up real well on  
6 the transcript, so I'll just prod you for a yes or no  
7 just to be sure we know what your answer is. Okay?

8 A. Okay.

9 Q. If I ask a question that just does not make  
10 sense or it's confusing for whatever reason, please  
11 ask me to rephrase it. It does not offend me at all.  
12 You know, you're a medical expert. I'm not. So if I  
13 say something that just doesn't seem right, please  
14 don't hesitate to ask that. Okay?

15 A. Okay.

16 Q. And if you need a break at any point, let me  
17 know. I typically will try to take a break about  
18 every hour, whenever we need one. It sounds long, but  
19 trust me, the time goes faster than you think.

20 A. Okay.

21 Q. Now, I have to ask this of each person, so I  
22 do apologize in advance. Have you ever been convicted  
23 of a crime?

24 A. No.

25 Q. Are you on any sort of medication, drugs or



1 anything that would affect your ability to remember  
2 facts from years ago?

3 A. No.

4 Q. Okay. For this deposition I'm going to ask  
5 you some questions about how you prepared for it. I  
6 don't want to know any sort of substance of a  
7 conversation you had with Mr. Whitfield. But I would  
8 assume you did speak with Mr. Whitfield regarding this  
9 deposition; is that correct?

10 A. Yes.

11 Q. How many times did you guys talk to prepare  
12 for this deposition?

13 A. Twice.

14 Q. When was the first time?

15 A. Last week. I'm not sure of the day. And  
16 then earlier today.

17 Q. Last week, ballpark, how long did that  
18 conversation last?

19 A. About an hour and a half.

20 Q. What about the one this morning?

21 A. 20 minutes.

22 Q. How did you first find out that you were  
23 going to be sitting for this deposition in this case?

24 A. I believe Tommy emailed me, first reached  
25 out through email.

1 Q. Okay. Did you review any medical records in  
2 preparation for this deposition?

3 A. I did.

4 Q. Which medical records did you review?

5 A. I looked at the wound care note from the  
6 patient, Joe Papin's daily progress note, a couple of  
7 daily progress notes, and then the operative note on  
8 the patient in question with the sacral decubitus  
9 wound.

10 Q. Okay. Any other records that you reviewed?

11 A. I looked at text messages and my previous  
12 report in that meeting in 2017.

13 Q. Okay. Anything else?

14 A. I believe that's all.

15 Q. Okay. So the medical records for the ulcer  
16 patient, we'll talk about that person as well. And  
17 then text messages. Those are the two types of  
18 documents you looked at?

19 A. Uh-huh (positive response).

20 Q. Is that a yes?

21 A. Yes. Sorry.

22 Q. It happens every time.

23 A. Yeah.

24 Q. I know you testified you've been in Columbus  
25 about two years. Are you married?

1 A. Yes.

2 Q. How long have you been married?

3 A. Four or five years. Five years.

4 Q. Do you have any children?

5 A. Yes.

6 Q. How many kids?

7 A. One.

8 Q. How old are they?

9 A. Nine months old.

10 Q. Oh, man. Hopefully sleeping.

11 A. Not really.

12 Q. I have a nine and a four-year-old. I've  
13 been there. Luckily mine weren't terrible.

14 But if you could, walk us through your  
15 education background, kind of starting with high  
16 school, where you graduated, and up through your most  
17 recent schooling.

18 A. I went to Columbus High School in Columbus,  
19 Mississippi, graduated in 2003. Went to Mississippi  
20 State University, majored in biochemistry and  
21 molecular biology, graduated in 2007. I took a gap  
22 year and then went to medical school at the University  
23 of Mississippi in Jackson, Mississippi, graduated in  
24 2012. Started general surgery residency after  
25 graduation, did a fellowship in critical care,

1 surgical critical care in 2015 to 2016. And then came  
2 back to finish my fourth and fifth year of general  
3 surgery residency and graduated in 2018.

4 Q. Okay. The fellowship, was that at UMMC,  
5 too?

6 A. Yes.

7 Q. So I guess what years were you then at UMMC,  
8 ballpark?

9 A. So 2008 started medical school and then 2018  
10 finished residency.

11 Q. And then is that when you got the position  
12 where you are now in Columbus, Georgia?

13 A. Yes. We moved about October -- I started  
14 October 1st, 2018.

15 Q. Okay. And which hospital do you work for?

16 A. Piedmont Midtown.

17 Q. And that is Columbus, Georgia; right? Not  
18 Mississippi?

19 A. Right, yes.

20 Q. Do you remember Dr. Papin?

21 A. I do.

22 Q. When did you approximately work with  
23 Dr. Papin time frame-wise?

24 A. I believe it was when I came back from my  
25 fellowship. So 2016, July 2016-2017.

1 Q. And I think at that point in time you were  
2 considered a chief resident; is that accurate?

3 A. I was a fourth-year, so I was chief on  
4 certain services. A true chief is a fifth-year  
5 resident.

6 Q. If you could explain to me what you mean by  
7 being a chief on certain services?

8 A. A chief on a service just means that you're  
9 the highest level of resident for that service.

10 Q. And for the record, when you say "a  
11 service," I'm just trying to make sure we're on the  
12 same page. What do you mean by "a service"?

13 A. A service being like trauma surgery service,  
14 general surgery service, thoracic surgery service.  
15 Different types of surgery.

16 Q. To explain, I understand that some of my  
17 questions may seem basic. But there's a chance that  
18 the transcript could be read to a judge or a jury one  
19 day.

20 A. Sure.

21 Q. So I might have to ask those questions just  
22 to make sure laypersons can understand what's going  
23 on.

24 A. I understand.

25 Q. So when you were that fourth year and you

1 were the chief for one of those services, what were  
2 your job duties and responsibilities in a nutshell?

3 A. While continuing our basic general surgery  
4 training, we're also overseeing the residents below  
5 us, taking trauma call approximately two weekends a  
6 month. And then when we're on call for trauma, we  
7 also have to field general surgery consults.

8 Q. Okay. What about the responsibilities in  
9 regards to other lower residents than you, first,  
10 second, third years?

11 A. We're supposed to help with their training  
12 as well, kind of teach them in the operating room. If  
13 we notice that they're having any difficulties with  
14 their time efficiency, we're supposed to help them  
15 with that. And then overall monitoring of the patient  
16 care on our service.

17 Q. Is it different for a first-year resident  
18 versus a third-year resident?

19 A. Yes.

20 Q. In what way?

21 A. First-year residents are usually mostly on  
22 the floor, meaning they're in the patient wards.  
23 They're doing a lot of the notes, a lot of the patient  
24 orders, carrying out the responsibilities of calling  
25 consults, following up on the consult recommendations.

1 And they are generally the first line for the  
2 patients. The patients usually see them more than  
3 they see anybody on the team.

4 Q. When you say "the team," can you kind of  
5 describe to me who would be "the team"? What type of  
6 positions are part of the team?

7 A. The team usually consists of -- depending on  
8 the service, what service -- the trauma service in  
9 particular, we have a chief resident, a middle level  
10 usually, which would be a third year, and then two  
11 interns.

12 Q. You're saying "intern." Does that mean the  
13 first-year resident?

14 A. First-year resident.

15 Q. And when you say a chief resident, would  
16 that be you as a fourth-year chief of the service or  
17 are we talking an actual fifth-year chief resident?

18 A. For trauma surgery, the fourth year was the  
19 chief of that service.

20 Q. What about the attending physician? Are  
21 they part of the same team or no?

22 A. They are. The residents are on the team for  
23 usually a month at a time together. The attendings --  
24 we have several attendings that rotate weekly. So we  
25 would get one attending per week, and then they would

November 18, 2020

15

1 rotate to either acute care or ICU or research week,  
2 and then we get another one.

3 Q. And when you say "interns," when you're  
4 using that term, can I just assume that means just a  
5 first year?

6 A. Just a first year.

7 Q. So second year, you would no longer call  
8 them an intern?

9 A. Correct.

10 Q. When you are -- let me back up.

11 Did you work with Dr. Papin the whole time  
12 during this kind of -- we'll call it the latter half  
13 of 2016 into '17? Or was it different months based  
14 upon the rotations?

15 A. I don't know if we worked together any other  
16 months. I would assume that we did some calls  
17 together on the weekends because you're put randomly  
18 twice a month for 12 months. But we were together on  
19 the trauma service that December 2017.

20 Q. Is that when you specifically remember, but  
21 you can't remember any other assignments where you  
22 were on the same service?

23 A. No.

24 Q. If you could, just explain briefly when you  
25 say "the trauma service," what does that mean?



1           A.       The trauma service is trauma patients.  
2       We're a level 1 trauma center in Jackson. Anything  
3       from car wrecks to gunshot wounds, knife stabbings,  
4       whatever, would come in through the ER. They would be  
5       evaluated by the trauma team and then, if deemed  
6       admission, they would come onto the trauma service  
7       where the trauma team would round on them daily.

8           Q.       Okay. So then during that month, that  
9       December 2016 trauma service month, were you just  
10      overseeing the third-year resident and then two  
11      interns?

12          A.       Yes. That was the team. I was the chief of  
13      that. So yes.

14          Q.       Okay. I didn't know if you had other teams  
15      that you would be a part of or just that one.

16          A.       No. Just the trauma team.

17          Q.       And then, theoretically, the following  
18      month, whenever you'd rotate to a new service, you'd  
19      be part of a different team then?

20          A.       Correct.

21          Q.       What was your regular schedule like, if you  
22      can recall, during that December 16 trauma service?

23          A.       I don't recall specifics. But typically  
24      things ran the same way every month. The interns  
25      would see the floor patients; the mid level, whether

1 it's second or third year, would see the ICU patients;  
2 and then we would all meet together -- they would all  
3 meet with me. What we do is called "run the list"  
4 where we talk about every patient, and I get their  
5 take on new labs for the day, physical exam,  
6 anything -- any plans that are going on. And then we  
7 would then round with the attending when the attending  
8 was ready. Then the residents -- the lower-level  
9 residents would carry out the plans for the day, and I  
10 would either help them or be in the operating room.  
11 And then at the afternoon session, usually right  
12 before we signed out to the night team, we would meet  
13 again to run over the list again just to see if there  
14 was any new developments throughout the day.

15 Q. Okay.

16 A. And also we would -- any new trauma patients  
17 that came in to the ER we would have to evaluate if we  
18 were called during the day.

19 Q. Is this Monday through Friday or seven days  
20 a week? How often are you doing this?

21 A. For the trauma team that we're talking  
22 about, it would be Monday through Friday, yes. And  
23 then whoever is on call for the weekend would do  
24 essentially that same thing on Saturday and Sunday.

25 Q. So like for this, the ulcer patient that

November 18, 2020

18

1 we'll talk about in a little bit, is it fair to say  
2 that that person was in the hospital for quite some  
3 time, weeks?

4 A. I don't remember the exact dates, but yes.

5 Q. And so theoretically then you would have  
6 been discussing that patient every day when you were  
7 running the list in the morning?

8 A. We should be, yes.

9 Q. And maybe again in the afternoon depending  
10 upon if something came up?

11 A. Yes.

12 Q. Now, if nothing comes up for a patient, do  
13 you just kind of skip over them real quick? Or how  
14 does it work in practice?

15 A. Usually we just say "nothing new."

16 Q. So if it's like John Smith, you'd say:  
17 Nothing new since this morning, go to the next one?

18 A. Right.

19 Q. Is it fair to say that the afternoon running  
20 the list probably is shorter than the morning one?

21 A. It is.

22 Q. Now, what sort of authority did you have  
23 over an intern when you were the chief resident on a  
24 service?

25 A. Within the hierarchy of the residency

1 program, we're considered in charge of them. Every  
2 year is considered ahead of the level below them. So  
3 an intern has to answer to a second, third, fourth,  
4 fifth year. Second year has to answer -- you know,  
5 and so on.

6 Q. Do you remember during December 2016 who the  
7 other members of the team were, the mid year or the  
8 other intern?

9 A. I don't remember the mid year, but the other  
10 intern was Will Brooks (sic). He was a urology  
11 resident.

12 Q. Okay. Do you remember if the mid year was a  
13 second or a third year during that time frame?

14 A. I can't remember. And sometimes we had the  
15 military -- had military residents from the coast. It  
16 may have been a military resident.

17 Q. So for like the regular -- let me start  
18 over.

19 For Monday through Friday during that  
20 December 2016 time frame, what time are you normally  
21 coming into the hospital?

22 A. I don't remember exact times, but I had to  
23 be there by 7 a.m.

24 Q. And is it a 12-hour shift? What's the  
25 typical sort of end time?

1           A.       Every day except for Wednesday is -- we are  
2 on the clock from 7 a.m. to 5 p.m. And that's when  
3 the night team comes in. On Wednesdays it would be  
4 7 a.m. to 7 p.m. because we have our educational  
5 conferences that day.

6           Q.       And who would attend the educational  
7 conferences on those Wednesdays?

8           A.       All the residents and some attendings.

9           Q.       So did it matter what year residents you  
10 were or just all of them?

11          A.       All of them.

12          Q.       And who would be on the night team?

13          A.       The night team consisted of four residents.  
14 It was called the "night float team." And that would  
15 be an intern, second year, third year, and fourth  
16 year, and then the attending.

17          Q.       Is it sort of -- and pardon me for my  
18 ignorance of how it works. But is it sort of two  
19 equivalent teams, just one is day and one is night?

20          A.       It's not equivalent. Every surgery  
21 service -- and I believe at the time we had nine  
22 surgery services. So every team during the day was  
23 assigned to a specific surgery service. You take care  
24 of the patients, do anything that needs to be done for  
25 patient care, and then you sign out to the night float

1 team, which is only four residents. And then they  
2 split up those nine surgery services amongst really  
3 the three of them. And then the chief was in charge  
4 of making sure everything kind of ran smoothly. And  
5 then they would also have to -- while covering those  
6 services, they would also have to see new patients and  
7 then the consults.

8 Q. Okay. What is the first memory you have  
9 when you first met Dr. Papin?

10 A. I really can't recall.

11 Q. Do you remember if on the first day of his  
12 residency if you told him that you were going to have  
13 problems with him?

14 A. No, I don't recall.

15 MR. MORGAN: Let's go off the record for one  
16 second here.

17 (A DISCUSSION WAS HELD OFF THE RECORD.)

18 MR. MORGAN: We're going to mark this first  
19 exhibit as Exhibit 1 here.

20 (EXHIBIT 1 WAS MARKED

21 FOR IDENTIFICATION.)

22 BY MR. MORGAN:

23 Q. Dr. Mahoney, do you see this on your screen?

24 A. Yes.

25 Q. This is an email from you to Dr. Earl and

1 Renee Greene on January the 10th of 2017. Do you  
2 remember this email?

3 A. Yes.

4 Q. Why did you write this email?

5 A. After we found out everything about the  
6 sacral decubitus wound, I had concerns about what had  
7 happened. My biggest concern was I felt that Joe had  
8 lied to me. So I went to Dr. Earl and Renee. And if  
9 I remember correctly, they told me to write it down in  
10 an email just so I had it all on paper. So I composed  
11 this email and sent it to them.

12 Q. Do you remember when you spoke to Dr. Earl  
13 or Renee about this?

14 A. It would have been after the holidays, so  
15 beginning of January.

16 Q. Okay. Because this was sent on January  
17 10th. I didn't know if you had a memory -- if you  
18 talked to them maybe the day before that and said,  
19 okay, I'm going to send it tomorrow or something.

20 A. It would have been probably that Monday or  
21 Tuesday, but I don't recall the exact date.

22 Q. And did you speak to both of them together  
23 or were these separate conversations?

24 A. I don't remember.

25 Q. Do you remember anything else about the

1 conversations other than them saying to put it in  
2 writing?

3 A. No, I don't.

4 Q. Did they make any comment about Dr. Papin  
5 themselves?

6 A. No, not that I recall.

7 Q. And so this note -- I believe you said this,  
8 but correct me if I'm wrong -- this note was really  
9 spurred from your concern with the decubitus ulcer  
10 patient?

11 A. Yes.

12 Q. And I believe you said because you felt that  
13 Joe had lied to you about that patient?

14 A. Yes.

15 Q. What specifically do you think he lied to  
16 you about?

17 A. I felt that he had lied about his own exam  
18 of the patient. Going into some detail, I was in  
19 the -- when I was in the ICU during my fellowship, we  
20 had patients that would require laying in bed for long  
21 periods of time and would develop wounds on their  
22 back. And it can be very bad, very morbid for the  
23 patient. So I wanted the residents to look at the  
24 backsides once weekly just to make sure that there was  
25 nothing there that I needed to know about that we



1 could address. And I had asked every -- I guess for  
2 two weeks I had asked both Will and Joe about certain  
3 patients that may have been there for longer periods  
4 of time. And Joe had said that this patient did not  
5 have any wounds on their back.

6 Q. What did Will say about the patient?

7 A. Just no, there was nothing there.

8 Q. So Will also said no, there was nothing  
9 there?

10 A. Oh, no. Will wasn't seeing this particular  
11 patient that I remember.

12 Q. When you say you instructed them to look at  
13 the backside, is that a verbal instruction or is that  
14 in writing anywhere?

15 A. I sent emails at the beginning of most  
16 rotations. I don't know if I sent one. I don't  
17 remember. But it definitely was a verbal.

18 Q. When you would talk to and verbally give  
19 this to the residents, what did you mean when you  
20 would say "check their backsides"? Did you expand on  
21 that to them or was it just simply "check their  
22 backside"?

23 A. Turn them over, get the nurses to help you  
24 turn them over if you can't get them over. Because  
25 usually it takes more than one person. We have med

1 students on our service as well, so usually the med  
2 students would be helping. And then look at the  
3 backside for any wounds.

4 Q. And if you see a wound, what do you do?

5 A. Let me know about it.

6 Q. But is there a certain level of wound?

7 A. I told them -- because you never can tell  
8 what people's experience is. So I said -- typically  
9 what I would tell them is if you see even just a red  
10 skin tear or a huge gaping hole, let me know and  
11 anything in between.

12 Q. So it could have been like the most minor of  
13 minor abrasions you would want to know?

14 A. Yes.

15 Q. So your testimony then is that for kind of  
16 the first half of this December time frame, Joe did  
17 not tell you there was a wound?

18 A. Correct.

19 Q. Did you review the patient's chart during  
20 this beginning of December time frame?

21 A. Not during the beginning, no.

22 Q. Why not?

23 A. We have -- the trauma service is very large.  
24 So I did not have the time to go through every  
25 patient's chart unless there was a concern from the

1 resident or that I got a call from one of the nurses.  
2 In that case I would go into the patient's chart and  
3 look at details. But otherwise I relied on what the  
4 interns were telling me.

5 Q. So this patient would have come up several  
6 times during your running-the-list meetings?

7 A. Yes.

8 Q. And do you remember at any time during those  
9 running-the-list meetings Joe mentioning the wound  
10 care team had seen this patient?

11 A. No, I don't -- he did not.

12 Q. Do you remember anything at all about this  
13 particular patient during the running-the-list  
14 meetings?

15 A. Because of what happened afterwards, it  
16 stuck in my mind. Because on Mondays when we would  
17 meet together before rounding with the attending, I  
18 would say: Does this person -- did you turn this  
19 person over, do they have a wound? And he would say  
20 no.

21 Q. Would he say he turned them over, just no  
22 wound?

23 A. He would just say no wound.

24 Q. Do you have a specific memory of that or is  
25 that just what you believe?

1           A.       No. I remember. Because we were standing  
2 outside the patients' rooms. And, you know, it sticks  
3 in my mind because of what happened to this patient  
4 and the wound that I saw.

5           Q.       After you sent this January 10th email,  
6 Exhibit 1 here, what was the next discussion you had  
7 regarding Dr. Papin with either Dr. Earl or Renee  
8 Greene?

9           A.       I don't remember. I don't remember what was  
10 said. I just remember that Dr. Earl became more  
11 involved and was going to have discussions. And  
12 honestly, my next memory of anything occurring is that  
13 2017 appeals meeting.

14          Q.       Okay. So as we're sitting here today, you  
15 remember this email. But then it's sort of -- I won't  
16 say a blank but unclear memories until the actual  
17 appeal hearing?

18          A.       Correct.

19          Q.       Do you remember at one point you gave Joe a  
20 numbering system for his behavior?

21          A.       Yes.

22          Q.       If you could, explain what is that numbering  
23 system?

24          A.       From the beginning of the month Joe had  
25 certain characteristics. And I can't remember them

1 all. But I felt like I was having to repeatedly say  
2 something to him about his behavior. And I got to the  
3 point where, rather than having to say something to  
4 him every time, I said: Look, we're going to come up  
5 with a numbering system. That way I don't have to say  
6 anything to you in front of people. Because every  
7 once in a while -- you know, we couldn't leave the  
8 room because we were in a trauma situation. And if  
9 Joe wasn't listening to something I said, then I  
10 wanted to be able to let him know that he was  
11 exhibiting that behavior without having to call him  
12 out in front of people. So we created a numbering  
13 system. 1 was this, 2 was this. I don't remember the  
14 exact characteristics or behaviors. But if he was  
15 doing something, I would say: Joe, number 1.

16 Q. Understanding you may not remember which  
17 number was what, do you remember what any of the  
18 characteristics were that were numbered?

19 A. Only because I've reviewed some of the  
20 paperwork for this. One of them was like: Don't be a  
21 douche.

22 Q. And what do you mean by that?

23 A. He would get an attitude with people, even  
24 me sometimes. And you just can't have that when  
25 you're on a team.

1 Q. Do you remember any other ones besides being  
2 a douche?

3 A. Not really, no. It's been so long.

4 Q. I'm going to show you -- is your phone  
5 number 662-386-1027?

6 A. Yes.

7 Q. Is it fair to say you and Joe would text  
8 during the day?

9 A. Yes. I'd text with every member of the  
10 team.

11 Q. Right, yeah. It seems like that's kind of a  
12 common way to communicate about patients and just  
13 things going on; is that fair to say?

14 A. Right, yes.

15 Q. I'm going to share here -- we'll mark this  
16 as Exhibit Number 2.

17 (EXHIBIT 2 WAS MARKED  
18 FOR IDENTIFICATION.)

19 BY MR. MORGAN:

20 Q. This looks like a text message between you  
21 and Joe. And I'll give you a second to just read it.  
22 But my question is going to center here -- it looks  
23 like in response to his -- and you can see my mouse  
24 moving; correct? (Indicating.)

25 A. Yes.

1 Q. In response to this text message here, it  
2 looks like you responded with "number 5." Do you see  
3 that?

4 A. Yes.

5 Q. That would have been a use of your numbering  
6 system to respond to certain behaviors?

7 A. Yes.

8 Q. Having looked at this, does this help  
9 refresh your memory at all of what number 5 would have  
10 been?

11 A. No. I mean I can make an assumption now  
12 based on reading it, but I don't know what it was back  
13 then in 2016.

14 Q. I don't want you to guess. But if you've  
15 got an educated guess, then certainly you can assert  
16 it.

17 A. My educated guess would be arrogance.

18 Q. Do you think that was one of the five?

19 A. It could have been, yes.

20 Q. Was lying one of them?

21 A. I don't recall. I think lying was mentioned  
22 in one of the documents that Tommy provided to me.

23 Q. But you don't remember yourself if lying was  
24 one of the numbers?

25 A. Not at this point, no. I just have to go

1 based on those documents.

2 Q. Do you think it would have been one of those  
3 numbers back then? That seems like a pretty serious  
4 behavioral trait.

5 A. It could have been, yes.

6 Q. You would agree with me there's a difference  
7 between being arrogant and then flat-out lying about  
8 something?

9 A. Yes.

10 Q. One is, I would imagine, much worse than the  
11 other?

12 A. Yes. Lying is much worse.

13 Q. In almost any profession, if you are a liar,  
14 you're going to get in trouble.

15 A. Yes.

16 Q. I mean if he lied to you, instead of you  
17 responding with a number, wouldn't you have said:  
18 Hey, you're in trouble for lying to me?

19 A. Yes, it should be.

20 Q. But other than the ulcer patient, there's  
21 nothing else that you can point to that you know where  
22 Joe lied to you?

23 A. Retrospectively, after the decubitus wound  
24 happened -- I can't remember specific examples. But  
25 when I looked back at our time over the course of the



1 month, I felt that he had been dishonest about  
2 different things. But I could not prove it, no.

3 Q. When you say "different things," do you mean  
4 in regard to this wound patient or something  
5 different?

6 A. Just in general, patient care, any patient,  
7 you know, whether it would be a lab value or doing  
8 something that I had told him to do and he didn't do  
9 it.

10 Q. And did you investigate and look into those  
11 allegations where you thought he was being untruthful?

12 A. No.

13 Q. It was just a general feeling you had?

14 A. Yes.

15 Q. Did you tell anybody about that general  
16 feeling?

17 A. I don't remember.

18 I would like to explain that with lying,  
19 interns particularly, it's a new world they're  
20 entering. There's a lot of education going on. There  
21 are times when an intern, even unfortunately  
22 upper-level residents, are caught in lies. You know,  
23 was their potassium okay today? And they say yes even  
24 though they didn't look at it because they're scared  
25 that they're giving the wrong answer. So whenever I

1 would recognize that -- if lying was a number for him,  
2 it would have been that I felt he was being dishonest  
3 about things -- which you could kind of tell just as  
4 you got up the scale in residency. And it was just  
5 something you would talk to the resident about. You  
6 know, I would rather you tell me that you don't know  
7 or that you didn't look than lie about it and say that  
8 it was okay.

9 Q. So there's been other times where other  
10 residents have told untruthful statements, and it's  
11 something that happens enough that you know to expect  
12 it and to try to correct it?

13 A. Correct. And it's usually minor things.  
14 But, you know they're scared that they've missed some  
15 things, so they don't give an honest answer.

16 Q. Why did you decide to use this number  
17 system?

18 A. Because I felt that I was -- from what I  
19 remember, I felt that we were having to have some sort  
20 of discussion or I was having to reprimand him several  
21 times a week, if not daily. And like I said,  
22 sometimes we would be in a trauma situation where we  
23 were in the trauma bay and could not leave the room to  
24 discuss privately, so I wanted to be able to say a  
25 number and he know what I was talking about even if

1 people were around.

2 Q. Wouldn't other people hear those numbers and  
3 think that was a little odd as well?

4 A. Probably, yes.

5 Q. But you felt it was better than completely  
6 reprimanding him in front of others?

7 A. Yes.

8 Q. Do you remember when in Joe's tenure you  
9 devised this numbering system?

10 A. I don't recall, no.

11 Q. Was it before the December 2016 trauma  
12 service?

13 A. It had to have been during that month. I'm  
14 not sure exactly what point we came up with it,  
15 though.

16 Q. Earlier I asked you about, you know, if you  
17 had ever -- do you remember ever telling Joe "am I  
18 going to have a problem with you" at any point in  
19 time?

20 A. I don't recall that, saying that  
21 specifically. It may have been in one of the  
22 documents. But no, I don't recall saying that to him.

23 Q. Could it have been during that first week of  
24 the trauma service?

25 A. It could have been, but I don't remember.

1 Q. You don't have an actual memory of saying  
2 that?

3 A. No.

4 Q. Did you ever do this numbering system for  
5 anybody else?

6 A. No.

7 Q. If you had to reprimand other residents,  
8 would you do it in front of others? Or how would you  
9 do it?

10 A. If it was a situation where, you know, right  
11 in the moment they needed to be told to stop doing  
12 something, then yes, I would do it in front of other  
13 people. I tried to always do it in private, but there  
14 were times where I would do it in front of people,  
15 yes.

16 Q. Do you recall the situation where Joe had  
17 asked to go for a run?

18 A. I remember the second time he asked to go  
19 for a run.

20 MR. MORGAN: I'm going to mark as  
21 Exhibit Number 3 here --

22 THE WITNESS: Let me turn my phone off. I'm  
23 sorry. I thought I had silenced it.

24 MR. MORGAN: That's okay.

25 (EXHIBIT 3 WAS MARKED

1 FOR IDENTIFICATION.)

2 BY MR. MORGAN:

3 Q. And this looks like -- this is an email --  
4 text message between you and Joe from December 6 where  
5 it looks like he was asking you to go for a run and  
6 you responded, quote, "as long as pagers work." Do  
7 you see that?

8 A. Yes.

9 Q. So in this situation you allowed him and  
10 were okay with him going for a run?

11 A. Yes, apparently.

12 Q. When you say "apparently," what do you mean?

13 A. That I was okay with him going that day. I  
14 didn't tell him no.

15 Q. Is that something other residents and  
16 doctors do occasionally?

17 A. No.

18 Q. Never?

19 A. Never. Occasionally, you know, somebody  
20 needs to run an errand, something, and they'll let us  
21 know and we cover for each other. But something as  
22 minor or personal as just going for a run is not done.

23 Q. So have you ever heard of any other resident  
24 or physician or anybody else at UMMC ever asking for  
25 permission or exercising during the day?

1           A.       Not during the day. Not during their shift,  
2 no.

3           Q.       I'll show you what we're going to mark as  
4 Exhibit 4. This is the second text message, December  
5 15, between you and Dr. Papin. Do you see this?

6           A.       Yes.

7                   (EXHIBIT 4 WAS MARKED  
8                   FOR IDENTIFICATION.)

9 BY MR. MORGAN:

10          Q.       And in this one it looks like -- I'll let  
11 you read it -- but you rejected his request to go for  
12 a run?

13          A.       Yes. And I remember this day very well.

14          Q.       What do you remember about it?

15          A.       I had been in the operating room with a  
16 trauma patient. And then I got the -- when I got out  
17 of the OR, I remember seeing the text. And it seemed  
18 very unprofessional. I do remember that Joe was first  
19 call that day. So I didn't feel it was appropriate  
20 for him to leave the hospital when he was the first  
21 call for the trauma service, meaning that if the  
22 patient coded on the floor or their heart stopped  
23 beating, he would be the first one notified.

24          Q.       Now, do you know if on that same day we were  
25 looking at, did Joe actually go for a run?

1 A. He said he did not. I do not know.

2 Q. Do you have any reason to doubt him?

3 A. Well, I don't -- at the time, you know,  
4 based on my memories of him, I would not trust him,  
5 no.

6 Q. But did you trust him at the time?

7 A. At that time I would trust him not to lie to  
8 me, yes, about something -- about leaving the  
9 hospital.

10 Q. Now, you testified earlier that you recall  
11 the appeals hearing regarding Dr. Papin; correct?

12 A. Yes. I remember being there and speaking.

13 Q. Okay. I'm going to share this. This will  
14 be --

15 A. I'd like to add -- may I add on that text  
16 message the other reason I was upset was because I had  
17 been in the operating room; he knew I was in the  
18 operating room. And when your chief resident is, you  
19 know, not available for emergency situations, it's  
20 good to have all hands on deck. So I don't know the  
21 timing of that first text. I obviously -- you know,  
22 I'm guessing I was not in the operating room. But  
23 that was another thing that frustrated me, was that  
24 his chief was not able, so he really needed to stay  
25 there to be a part of the team.

1 Q. Okay. Because you were in there dealing  
2 with an emergency situation, you felt it was  
3 especially not a good time to be requesting something  
4 like that?

5 A. Right, yes.

6 Q. I'm going to show you -- this is the appeal  
7 transcript. This was on July 18th, 2017. Does that  
8 seem about the right time frame to you, if you recall?

9 A. Yes. A lot of this kind of runs together.

10 Q. And I'm going to page -- this is page 50 of  
11 this transcript.

12 Now, did you attend this proceeding in  
13 person or were you by phone?

14 A. I was in person.

15 Q. Where was it held?

16 A. In one of the conference rooms at the  
17 University Medical Center.

18 Q. In this transcript here, I'm getting to the  
19 point where you talked about the exercising. There  
20 was a question where you talk about here -- do you see  
21 where it says, your second text message, about: "Hey,  
22 are you joking?" Do you remember that?

23 A. Uh-huh (positive response).

24 Q. That was when you had rejected him to go  
25 running; correct?



1           A.       Well, I was more surprised -- I didn't feel  
2 like he had really asked me if he was going. So I was  
3 surprised by his text of saying I'm going to go  
4 running.

5           Q.       And then you were asked a question later  
6 here about: "Was that the first time you and  
7 Dr. Papin had ever discussed exercise or leaving to  
8 exercise?"

9                   And your answer was: "To my remembrance,  
10 yes."

11                  Do you see that?

12          A.       Yes.

13          Q.       Is it fair to say, though, that that's not  
14 true because you had actually texted about it the week  
15 before on December the 6th?

16          A.       Right. That was incorrect on my part.

17          Q.       I'm sorry?

18          A.       That was incorrect on my part. I did not  
19 remember that first text.

20          Q.       Okay. Before the hearing did you go back  
21 and review text messages or medical records or  
22 anything like that?

23          A.       I don't remember.

24          Q.       You don't remember if you did or you don't  
25 think you did?

1           A.       I don't remember if I did. I know I had  
2 some text messages from him, but I don't remember  
3 before this particular meeting if I reviewed anything.

4           Q.       Did anybody ask you to review anything  
5 before the meeting?

6           A.       No.

7           Q.       Sorry. I'm just going through my outline  
8 here, making sure I'm covering all the things.

9                    I want to go back to Exhibit Number 1 here.  
10 And I'm looking in particular at about -- well, I'm  
11 not going to say paragraph 2 but where it talks about  
12 number 2 here. Do you see that?

13          A.       Yes.

14          Q.       And this was about the time where there was  
15 a code that was called for one of Joe's patients. Do  
16 you recall that matter?

17          A.       I don't recall specifics of the incident.  
18 I remember that it happened. But I don't remember  
19 specifics.

20          Q.       What do you remember about it?

21          A.       I only remember what I've read from the text  
22 messages and from this email. But Joe had sent me a  
23 text asking me for another chief resident's phone  
24 number, and I gave it to him. And I asked, you know:  
25 What's going on? Is it something to do with trauma?

1           And then he told me that he had, I guess, an  
2 inappropriate conversation -- the night intern had  
3 been rude and inappropriate with him, he felt. And I  
4 really don't have much recall of anything else.

5           Q.     Let me see if I can make it a little smaller  
6 here. There we go. Is that a little better?

7           A.     Yes.

8           Q.     Is this the text you were just talking  
9 about?

10          A.     Yes, it is.

11          Q.     Okay. So the gray part on the left here is  
12 Joe responding back to you?

13          A.     Uh-huh (positive response).

14          Q.     Is that a yes?

15          A.     Yes.

16          Q.     So he sent this to you almost around the  
17 same time that this was occurring. I mean it looks  
18 like it was sent at 6:49. So we're talking less than  
19 an hour after the situation; correct?

20          A.     Right.

21                   (EXHIBIT 5 WAS MARKED  
22                   FOR IDENTIFICATION.)

23 BY MR. MORGAN:

24          Q.     And then your response to it was just:  
25 "Okay." Is that accurate?

1 A. Yes.

2 Q. After this incident occurred did you go talk  
3 to Joe about this? Was it a big deal at this time on  
4 this date or the next day when you saw him?

5 A. I was not at the hospital when this  
6 happened. I don't even know if I was there the next  
7 day. I'm not sure. This must have been on a  
8 Wednesday, so I guess I would have been there on  
9 Thursday. But I don't remember the details, no. I  
10 don't know if I talked to him about this again. I  
11 really don't know.

12 Q. It looks like it was sent on Monday,  
13 December the 12th.

14 A. I see that.

15 Q. So you don't recall subsequent to this  
16 talking to Joe about this?

17 A. I don't remember talking to Joe. I talked  
18 with Ashley, the other chief resident, but I don't  
19 remember what we discussed.

20 Q. And for the record, who is Ashley?

21 A. Ashley is the chief resident that he's  
22 referring to in the text message.

23 Q. Is she the chief resident fifth year or  
24 chief resident fourth year over a service?

25 A. She would have been in the fourth year. She

1 was my year.

2 Q. Now, in here do you know who he's talking  
3 about when he says Kelly and Jack?

4 A. I do know a Kelly and Jack. I'm assuming  
5 it's the night team.

6 Q. And who are they?

7 A. Kelly would have been Kelly Brewster. She  
8 would have been a second year maybe. And then Jack is  
9 another resident.

10 Q. Okay. Do you know --

11 A. I'm assuming those are the residents we're  
12 talking about. I don't know any other Kelly or Jack.

13 Q. Do you remember what year Jack was at that  
14 time?

15 A. Jack was a year behind me, so he would have  
16 been a third year.

17 Q. It says: "A code was called on the PA for  
18 3N." I believe that stands for 3 North?

19 A. Yes.

20 Q. What is 3 North?

21 A. 3 North is one of the surgery floors where a  
22 large portion of the trauma patients are at.

23 Q. How big is 3 North? How many patients are  
24 we talking about? How many beds are available to help  
25 people?

1           A.       I want to say there's 32 or 33 rooms on  
2   3 North.

3           Q.       And Will, is that the same Will Bruch we  
4   talked about earlier?

5           A.       Yes.

6           Q.       And he was the one who was also a first-year  
7   intern with Joe?

8           A.       Yes.

9           Q.       Now, who is Aaron that's listed?

10          A.       Aaron, he was also a urology intern who was  
11   the resident -- or who was the intern for the night  
12   float team.

13          Q.       So remind me, I'm sorry, who did you speak  
14   to after this text? You said you didn't speak to Joe,  
15   but you spoke to others?

16                   MR. WHITFIELD: Object to the form.

17   BY MR. MORGAN:

18          Q.       You can still answer, Dr. Mahoney.

19          A.       I remember only speaking to Ashley.

20          Q.       And what was that conversation you had with  
21   her about?

22          A.       We talked about the situation, but I don't  
23   remember what was said.

24          Q.       Do you remember thinking after that  
25   conversation that Joe had done something wrong?

1           A.       I remember thinking that -- I guess by this  
2 point I must have been making up a -- making my mind  
3 up about him that he wasn't a team player, and I  
4 remember thinking that this just further exemplified  
5 that.

6           Q.       When you say "not a team player," what do  
7 you mean by that?

8           A.       I mean that when you're a part of a team,  
9 you try to help each other whenever you can, even if  
10 that means staying late and doing a little bit extra  
11 just so all the work gets done and the patients get  
12 taken care of. And there were times I do recall that  
13 we would be in our afternoon sessions and I would ask  
14 about things, and Joe would say he didn't know or it  
15 wasn't his patient.

16          Q.       I'm going to go back to Exhibit Number 1  
17 here. If you can read number 2, this indicates that  
18 you did talk to Joe about it. Do you see that?

19          A.       The only recall that I have of talking to  
20 him was in that text message. But I mean we may have  
21 talked about it. I don't remember.

22          Q.       So do you think you meant the text message  
23 when you were writing this or were you talking about a  
24 separate --

25          A.       I don't know. I don't remember talking to

1 him in person, so I only remember the text message.

2 Could I have talked to him in person? Yes. I just  
3 don't remember.

4 Q. And then you say here: "He showed no signs  
5 of concern for the patient."

6 Do you see that?

7 A. Yes.

8 Q. Is that in the text message? Because I've  
9 not seen that in a text message unless you read it  
10 differently than I do. I can go back to it if you'd  
11 like me to.

12 A. Sure.

13 No, I wouldn't say that there was no  
14 concern. I mean I would wonder why he was more upset  
15 about his confrontation with an intern rather than his  
16 patient having coded. But other than that, no, he  
17 does not specifically say anything.

18 Q. Would you agree that an accusation that  
19 somebody -- a doctor left knowing their patient was in  
20 trouble -- would you not consider that a serious  
21 accusation?

22 A. I would say that that is -- you have to kind  
23 of understand our night float system. I would say  
24 that if he knew about it and did not return, that  
25 would be a poor move on his part as a doctor.



1 Q. Have you ever heard of other situations like  
2 that occurring where doctors have done that or interns  
3 or anybody else?

4 A. I'm sure it's happened, but I can't recall  
5 any.

6 Q. Now, when the codes are called, can you just  
7 describe to me what is said over the loud speaker?

8 A. They would say "code blue" and then  
9 "3 North" or whatever floor. They would say the  
10 floor, not the specific room number.

11 Q. So would that mean that it could be any of  
12 those, ballpark, 32, 33 beds that are at 3 North?

13 A. Yes.

14 Q. And when you -- during this time frame, if  
15 you were there and you heard a code for 3 North, what  
16 would you do?

17 A. I would, as would -- what we would do as  
18 residents, we would call wherever we were at, call  
19 3 North -- we'd usually have those numbers  
20 memorized -- and speak with the unit secretary, ask  
21 which room number it was. I remember in a lot of  
22 these situations, if we were in the lounge, whoever  
23 was sitting closest to the phone would call up there  
24 and then yell out: Hey, room 316; does anybody have  
25 that? And then if those people -- if that team was

1 there in the lounge, then they would head up there.  
2 If not, usually we would try to text the team member  
3 to let them know that their patient was coding.

4 Q. And if a person has left for the day, like  
5 if it comes in an hour after the shift change, it  
6 would be the night team's responsibility to respond to  
7 the code?

8 A. Yes.

9 Q. Do you ever call a resident and say, hey,  
10 you need to come back to the hospital?

11 A. No.

12 Q. So here part of the issue is you have a code  
13 that occurred literally right at shift change?

14 A. Right.

15 Q. That could have contributed to the  
16 misunderstanding here?

17 A. It could have, yes.

18 Q. Let's go back to Exhibit 1 here. In number  
19 3 here you talk about how he wasn't logging cases. Do  
20 you see that?

21 A. Yes.

22 Q. What does that mean, not logging cases?

23 A. In order to graduate from a residency  
24 program, we have to prove that we've done so many  
25 cases, like 1,200 cases. So in order to make sure

1 that we're keeping up with that, Dr. Earl or whoever  
2 the program director is would just monitor, see when  
3 the last time you had logged cases, how long it had  
4 been, just so you don't fall behind. And in this  
5 situation, if an intern -- which usually the interns  
6 were bad about it -- but if an intern was not logging  
7 cases, then Renee would go to the chief resident to  
8 have us deal with the issue.

9 Q. So this was, is it fair to say, a common  
10 occurrence with interns?

11 A. More common than it should be, yes.

12 Q. The idea would be Renee comes to you and you  
13 go to the resident because you've got a little bit  
14 more authority to sort of prod them to get their  
15 logging of cases done?

16 A. Yes.

17 Q. And so here you said that you later found  
18 out that Joe had not logged anything since the day in  
19 Renee's office. Do you see that?

20 A. Yes.

21 Q. What was the day in Renee's office? Is that  
22 when you, Joe, and Renee were there?

23 A. I don't remember being in the office with  
24 Joe and Renee. And I don't -- I really don't know how  
25 I would have found out that he had not logged anything

1 unless Renee had told me.

2 Q. I was going to ask -- that was my next  
3 question. How did you find out he hadn't logged  
4 anything?

5 A. I don't know for sure. Renee was usually  
6 the one that gave us that information, though, because  
7 she would kind of keep up with it for Dr. Earl. And I  
8 might have even asked her. I really don't remember.

9 Q. Could you check to see if he had logged  
10 cases?

11 A. No.

12 Q. Is there any sort of deadline to log the  
13 cases?

14 A. I feel like at some point Dr. Earl said you  
15 had to have them done within the last two weeks. And  
16 I do remember my fourth and fifth years kind of  
17 rushing to even log my own cases before a PD meeting.  
18 So I think it was generally before the PD meetings. I  
19 feel like those were every two weeks.

20 Q. When you say the "PD meetings," what does  
21 that mean?

22 A. Program director meetings. We would meet  
23 with Dr. Earl as a group.

24 Q. With all the surgery residents?

25 A. Whoever could come, if you weren't in the

1 OR, show up and we would meet with Dr. Earl.

2 Q. And that was every two weeks?

3 A. I think so. It was either monthly or every  
4 two weeks.

5 Q. And so were the cases from the previous two  
6 weeks supposed to have been logged by then? Is that  
7 how it worked? Or something different?

8 A. For the program director meetings, yes. For  
9 the interns in this situation, Renee usually did not  
10 talk to us about it unless it had been weeks and weeks  
11 and they were very far behind. So I don't know how  
12 far behind he would have been. But she didn't talk to  
13 us about talking to the intern unless they were very  
14 far behind.

15 Q. Is it fair to say Renee had brought other  
16 interns to you as well that were behind on their  
17 logging?

18 A. At some point she would have, yes.

19 Q. So it wasn't just an issue that was solely  
20 unique to Joe?

21 A. No. They probably even talked to me about  
22 logging cases.

23 Q. There's only so many hours in the day.

24 A. Exactly.

25 MR. MORGAN: Well, we've been going about an

1 hour, so let's just take about a five-minute break.  
2 I'm kind of jumping around on my outline, too. So let  
3 me take some time to cross out some of these things.

4 THE WITNESS: Okay.

5 MR. MORGAN: So we'll just adjourn for five  
6 or so.

7 THE WITNESS: Okay.

8 (A RECESS WAS TAKEN FROM 3:00 P.M.  
9 TO 3:11 P.M.)

10 BY MR. MORGAN:

11 Q. Dr. Mahoney, are you good?

12 A. Yes.

13 Q. Okay. Let's go back on the record here.

14 Do you recall -- let me pull up  
15 Exhibit Number 1 again. In regard to number 4 here  
16 about nurses who complained about Joe, do you recall  
17 that?

18 A. Yes.

19 Q. What do you recall about that? Who are  
20 those nurses?

21 A. They were the nurses on 3 North. I just  
22 remember standing at the front nurses station and then  
23 having a lot of nurses come tell me things about Papin  
24 that they didn't like. I don't remember exactly what  
25 they said, though.

1 Q. You wrote a few sentences here. So you have  
2 no other independent memory besides what you've  
3 written there?

4 A. Correct. I just remember standing at the  
5 nurses station having a lot of -- at least several  
6 nurses coming up to me and telling me their issues  
7 with Papin, Joe.

8 Q. Is it fair to say you don't remember any  
9 other examples besides what you've listed here?

10 A. Not that I recall, no.

11 Q. Anything else you can remember now about  
12 another nurse or anything saying anything negative  
13 about Dr. Papin?

14 A. Not that I remember. I just remember the  
15 specific instance because there were so many of them.

16 Q. Have other interns had issues with nurses?

17 A. I'm sure, yes.

18 Q. Have you ever had a situation where you've  
19 been the chief where an intern was having issues with  
20 nurses?

21 A. I don't remember specific examples. I think  
22 the biggest problem was sometimes nurses felt like  
23 they weren't being listened to, and so I would address  
24 it with a resident. I don't recall it ever becoming  
25 more of an issue.

1 Q. Did you ever talk to Joe about these issues  
2 with the nurses?

3 A. I believe I did, yes.

4 Q. What did you and Joe discuss?

5 A. I don't remember what was said. But I would  
6 have -- I would have told him what they had said to  
7 me, their issues, and that he needed to work on these  
8 things with them because they can make our lives more  
9 difficult as doctors.

10 Q. In what way?

11 A. We expect them to be our eyes and ears  
12 because they are on the floor with the patients.  
13 They're with them throughout the day. So I expect --  
14 you know, if you have a good relationship with a  
15 nurse, she's going to let you know something right  
16 away. Sometimes if you have a really good  
17 relationship with a nurse, she'll be at the door  
18 waiting for you to round. And that's what you hope  
19 for.

20 Q. So if you have a bad relationship with a  
21 nurse, they may not come to you immediately regarding  
22 patients?

23 A. Not necessarily come to you immediately but  
24 just -- I feel like there's more communication,  
25 there's just better rapport with the entire staff.



1 Like if you have a good relationship with a nurse,  
2 they might send you a text message. That's all I mean  
3 by that.

4 Q. But if it's a bad relationship, they  
5 wouldn't text you?

6 A. You probably haven't shared numbers with  
7 each other.

8 Q. You can't remember any other specific  
9 examples about other -- either other times besides  
10 what you've described here for Joe with conflict with  
11 nurses or any other resident in conflict with nurses?

12 A. Nothing specific, no.

13 Q. But you believe it's happened before for  
14 other residents and you've addressed it and it's  
15 worked itself out?

16 MR. WHITFIELD: Object to the form.

17 A. Yes.

18 BY MR. MORGAN:

19 Q. The nurses here that you are talking about,  
20 are these nurses that are on the trauma service?

21 A. No. They're nurses on 3 North. So they may  
22 have trauma patients, but they're also taking care of  
23 any of those 32 patients on the floor.

24 Q. Would these have been nurses that Joe would  
25 have worked with during that December time frame or it

1 could be any time frame that he was there?

2 A. Any time frame he was there.

3 Q. Do you remember when this conversation with  
4 these nurses occurred?

5 A. I don't remember when, no. It may have been  
6 after the holidays.

7 Q. And then on number 5 here it talks about how  
8 a med student came to you and said that Joe was not  
9 seeing patients before rounds. Do you see that?

10 A. Yes.

11 Q. Which medical student was that who told you  
12 that?

13 A. I believe it was -- I think his name was  
14 Will Crews. We usually had two. I think it was Will  
15 Crews.

16 Q. And did Will Crews come to you -- was this a  
17 verbal conversation or text or email?

18 A. It was a verbal conversation. I don't know  
19 that he necessarily came to me. I have kind of  
20 debriefings at the end of the month, and I believe it  
21 was during one of those debriefings that he told me  
22 this.

23 Q. Are those debriefings, are those like an  
24 individual kind of one-on-one thing?

25 A. I would sit down with both the med students

1 or whoever the med students were unless they had been  
2 problematic.

3 Q. So do you think this conversation with Will  
4 Crews would have been witnessed by other individuals?

5 A. Yes. Whoever the other med student was.

6 Q. And do you remember what the other med  
7 student said about that allegation?

8 A. I don't recall, no.

9 Q. How did Will know that Joe was not seeing  
10 patients before his rounds?

11 A. The med students are also supposed to see  
12 rounds kind of as practice to do physical exams and  
13 report information to me and the attending. So the  
14 med students are usually there at the same time the  
15 interns are.

16 Q. Do they walk side by side, hand in hand, to  
17 go see each patient? Or how does it work in the real  
18 world?

19 A. Sometimes they do, sometimes they go see  
20 them individually.

21 Q. So there could be times where, for example,  
22 one is starting at one end of the hallway and one on  
23 the other end and they're kind of going opposite ways?  
24 Does that sometimes happen?

25 A. It does. On the trauma service the med

1 students are in charge of the list, so they usually,  
2 at least, got with the interns so that they could give  
3 the interns the list in the morning.

4 Q. Did you ever do your own investigation or  
5 double checking of Will's claim that Joe wasn't seeing  
6 patients?

7 A. By the time he had told me -- and I don't  
8 remember that he had any specific examples. No, I  
9 don't remember looking up anything.

10 Q. I mean you could have looked in the  
11 patient's chart to see if he had visited a patient; is  
12 that correct?

13 A. Well, he could leave a note, but it doesn't  
14 necessarily mean that he visited the patient.

15 Q. Was Will's accusation that Joe was there,  
16 just not seeing patients, or he just wasn't even there  
17 on the grounds yet?

18 A. From my remembrance, Will was saying that he  
19 was not going in and seeing patients and doing full  
20 physical exams. That's what I recall.

21 Q. Does that mean he was there at the hospital,  
22 just not doing that, or like he was late, just hadn't  
23 shown up to the hospital yet?

24 A. I just got that he was not going in the  
25 patient's room and seeing the patient. Whether he was

1 there or not, I don't know.

2 Q. And so you took Will's word for this?

3 A. Yes. I had no reason to not believe him.

4 Q. You personally never saw Joe not visit a  
5 patient?

6 A. No.

7 Q. You personally had no basis to question that  
8 Joe had not seen a patient?

9 A. I'm sorry. Say that again.

10 Q. You personally had no personal observation  
11 of anything that would lead you to suspect Joe had not  
12 seen a patient prior to rounds?

13 A. Correct. Until the sacral patient.

14 Q. And that's the ulcer patient?

15 A. Yes.

16 Q. Now, on the ulcer patient, do you think he  
17 did not see the patient or he did not correctly  
18 diagnose the patient?

19 A. I don't know what he did with the patient.  
20 I just know that he told me there was no wound. I  
21 don't know if he actually looked or not.

22 Q. But do you believe he actually went into the  
23 room and saw that patient?

24 A. I don't know.

25 Q. Earlier we were talking about your -- the

1 rule that you have about wanting to check the  
2 patient's backside. Do you recall that?

3 A. Yes.

4 Q. I'd like to get a little more in depth into  
5 that comment. When you say "check the backside,"  
6 what does that mean? Literally walk me through what  
7 you would expect somebody to do.

8 A. I would expect them to go into the room, do  
9 a physical exam, you know, assess their mental status,  
10 look in their eyes, mouth, you know, head to toe. And  
11 because it's difficult to move a 200-, 300-pound  
12 patient, we can't always rotate them over on their  
13 side to look at their back and then their butt area,  
14 which is more prone to these sacral wounds. So when I  
15 told them to look at their backside, that meant do  
16 your full normal physical exam that you do every day  
17 and then have somebody help you rotate the patient on  
18 their side to look at their back for any wounds.

19 Q. And when you're looking at the back, is that  
20 just lift them up, look, and then place them back  
21 down?

22 A. Usually, yes, you look, feel. If you see  
23 something, kind of touch it to see if it feels soft.

24 Q. Okay. Are you supposed to do those types of  
25 touching tests? I'm trying to figure out where is

1 that line where you're saying, okay, that's a  
2 sufficient examination of the backside?

3 A. Usually just laying eyes on it will tell you  
4 if they have a wound there or not because there will  
5 be a discoloration or marking on the skin.

6 Q. How did you -- how did you express what you  
7 wanted the residents to do to them? I know you  
8 testified that you said to check their backsides, but  
9 did you go to this level of detail that we were just  
10 discussing?

11 A. I don't recall. I just said look for  
12 their -- I would have said: Look at their back for  
13 wounds. I don't think I went into great detail of how  
14 to do a physical exam. I would expect them to know  
15 that already.

16 Q. I believe you testified earlier that you had  
17 some experience prior to this time frame with  
18 decubitus ulcers; is that accurate? If you could,  
19 explain what was your background with them?

20 A. I was getting a fellowship in the critical  
21 care unit, surgery critical care. And so when  
22 patients lay on their backs for prolonged periods of  
23 time, due to the pressure of the bed, they can get  
24 sacral wounds. It's not -- it's unfortunate but not  
25 an uncommon problem in medicine.

1 Q. Are there times when those wounds just  
2 happen regardless of what treatment you do?

3 A. Yes.

4 Q. And you can do everything in the book, but  
5 they'll sometimes just happen?

6 A. Yes.

7 Q. Now, during this time frame would you have  
8 seen this patient?

9 A. Yes.

10 Q. Would you have helped lift him up or seen  
11 the backside?

12 A. Only if the interns told me that they saw  
13 something, then I would look at it so I could make a  
14 better assessment of what kind of wound it was.

15 Q. When you're walking into a patient's room,  
16 like this patient, would you look at their chart  
17 before walking in?

18 A. Not typically, no. Not unless the resident  
19 had some concerns or if I walked into the patient's  
20 room and -- what we call the eyeball test -- they  
21 don't pass the eyeball test, then I would go look in  
22 their chart because something is going on.

23 Q. So if nobody had told you anything about the  
24 patient and you walked in, walk me through what you  
25 would be doing for a patient like this, this ulcer



1 patient.

2 A. So we typically talk about the patient  
3 either before walking around or outside the patient's  
4 room. Then we as a team would walk into the room. I  
5 would assess anything that I had been alerted to. If  
6 the patient is verbal, talk to the patient, ask them  
7 if they're having any pain. And then we walk out.

8 Q. For a person who has a wound, do you know  
9 what the term "staging the wound" is?

10 A. Yes.

11 Q. What does that mean?

12 A. Staging the wound is when we essentially  
13 assign a stage based on the depth of the wound.

14 Q. And who is responsible for staging the wound  
15 and making that call?

16 A. Typically it's either -- it depends on how  
17 much of the wound you can see. But wound care  
18 sometimes can stage it or the physician.

19 Q. When you say "wound care," what do you mean?

20 A. A wound care nurse.

21 Q. And what is a wound care nurse?

22 A. A wound care nurse is someone who  
23 specifically sees a patient just for wounds, sacral  
24 wounds, ostomy, anything.

25 Q. And correct me if I'm wrong, but the wound

1 care nurse will be requested to consult a patient by  
2 physicians?

3 A. Or occasionally the nurses. If the nurses  
4 during bathing have noticed a wound on the patient's  
5 backside, they'll go ahead and initiate a consult.

6 Q. So a nurse or a doctor can initiate it?

7 A. Yes.

8 Q. So is it fair to say that the nurses and the  
9 doctors rely upon the wound care nurses to review and  
10 assess these wounds?

11 A. Typically when I rely on the wound care  
12 nurse is if we can do any type of enzymatic  
13 debridements, meaning applying dressings or different  
14 types of creams, then that's when I rely on them.  
15 They make their recommendations, and then the nurses  
16 will carry out the wound care orders.

17 Q. Are there ever times when you review -- do  
18 you review what the wound care team states in the  
19 charts?

20 A. Yes.

21 Q. And do you typically follow their assessment  
22 and their treatment options?

23 A. I do. I always like to look at the wound  
24 myself, though, so I have an idea of what I think  
25 needs to be done. Because as a surgeon, I'm usually

1 the one that makes the decision to -- or I am the one  
2 that would make the decision, hey, this needs a  
3 debridement in the operating room.

4 Q. What is a debridement?

5 A. Debridement means taking away, cutting away,  
6 getting rid of dead tissue, necrotic tissue.

7 Q. Have there been times where you've  
8 overruled, for lack of a better term, the wound care  
9 team's assessment and treatment options?

10 A. No, not usually. We work pretty well  
11 together.

12 Q. I'm going to show you -- I'm going to start  
13 walking through some of these medical records here.  
14 This is the medical record for November the 15th of  
15 2016. And here it looks like, if you can read it -- I  
16 know it's a little small -- but it looks like  
17 Dr. Robertson initiated a wound care consult. Do you  
18 see that?

19 A. Yes.

20 (EXHIBIT 6 WAS MARKED  
21 FOR IDENTIFICATION.)

22 BY MR. MORGAN:

23 Q. Who is Dr. Robertson?

24 A. She was a trauma ICU doctor.

25 Q. Was she an actual -- she wasn't a resident?

1 She was a doctor-doctor?

2 A. She was an attending, yes.

3 Q. And so this would have been mid November,  
4 obviously, even before Joe would have come onto the  
5 trauma service?

6 A. Correct.

7 Q. And it looks like here the wound care nurse,  
8 who is Kelly Pennock, made some recommendations here  
9 for treatment. Do these look to be standard types of  
10 treatment for this?

11 MR. WHITFIELD: Object to the form.

12 A. I mean it looks like standard wound care  
13 orders. But it would depend on the type of wound.

14 BY MR. MORGAN:

15 Q. Do you know what the Pressure Ulcer  
16 Prevention Program is?

17 A. Yes.

18 Q. What is it?

19 A. It's a series of steps, guidelines to follow  
20 to help prevent pressure ulcers, things such as  
21 rotating the patient, essentially decreasing the time  
22 that bony prominences, as we call it, are touching the  
23 surface of the bed.

24 Q. Would it be fair to say that these  
25 recommendations are in line with that Pressure Ulcer

1 Prevention Program?

2 A. Yes.

3 Q. And it says here in the bottom, it says:  
4 "Monitor and notify MD/NP and WOCN of any changes."  
5 Do you see that?

6 A. Yes.

7 Q. What does that mean?

8 A. To monitor and let the doctor or nurse  
9 practitioner -- I'm not sure of WOCN, I'm guessing  
10 that's wound care nurse -- of any changes.

11 Q. When it says "monitor and notify," who was  
12 supposed to be monitoring and notifying?

13 A. The nurses and the trauma team.

14 Q. And that would be the trauma team from the  
15 interns all the way up through chief resident?

16 A. Yes.

17 Q. Would that also include the attending  
18 physician?

19 A. Yes. Working through the hierarchy, I would  
20 have let the attending know.

21 Q. And when it says "notify MD," who does that  
22 -- I know that stands for doctor. But I mean who  
23 specifically does that mean?

24 A. To me that means any doctor.

25 Q. Any of the team doctors?

1 A. Yes.

2 Q. I'm going to scroll down to here. This  
3 starts here, a record of December the 9th of 2016. So  
4 would you have been on the trauma service in November  
5 or would you have been somewhere else yourself?

6 A. I don't remember.

7 (EXHIBIT 7 WAS MARKED  
8 FOR IDENTIFICATION.)

9 BY MR. MORGAN:

10 Q. Were you on the same kind of month rotation  
11 or different?

12 A. It changed every year. Some months we would  
13 rotate. Sometimes we would do back-to-back months.  
14 But I don't recall. I feel like as a fourth year, I  
15 probably would have been back to back, but I don't  
16 recall what months I was on the trauma service besides  
17 December.

18 Q. And here it looks like another in-patient  
19 consult to wound care was given by Dr. Robertson on  
20 December the 8th. Do you see that right here?  
21 (Indicating.)

22 A. Yes.

23 Q. And then down here a little bit lower, this  
24 would have been -- -- do you know Kisha Dyse? Do you  
25 remember her?

1           A.       I remember her. I wouldn't probably be able  
2 to recognize her if I saw her, though. I remember the  
3 name.

4           Q.       And it looks like here that she assessed an  
5 unstageable pressure ulcer to the sacrum. Do you  
6 remember that?

7           A.       Yes.

8           Q.       What does that mean?

9           A.       That there is a pressure ulcer on his  
10 sacrum, which is part of his anatomy, and it's  
11 unstageable because she is not able to tell the depth  
12 of it.

13          Q.       Is this a common occurrence?

14          A.       To get a pressure ulcer?

15          Q.       To get an unstageable pressure ulcer like  
16 this? Do other patients have this come up?

17          A.       Yes.

18          Q.       And what's the normal treatment for those?

19          A.       It varies, but usually they start -- the  
20 wound care nurse will see them and make  
21 recommendations such as the MEDIHONEY or SANTYL, some  
22 sort of enzyme and the dressing change, and then we  
23 monitor.

24          Q.       Down here at the bottom there's some other  
25 recommendations here. Do these look like the normal,

1 typical recommendations for this kind of wound?

2 A. There's a lot of different recommendations.  
3 But yes, that could be something that's done.

4 Q. I mean do you look at that record and look  
5 at this and say, oh, my gosh, those recommendations  
6 there at the bottom are wrong?

7 A. No.

8 Q. So then at this point, so on December 9th,  
9 this would have been in this patient's chart; correct?

10 A. Yes.

11 Q. And so any member of the team, from the  
12 first-year interns up through you and up through the  
13 attending physician, could see this document?

14 A. Yes.

15 Q. So you testified earlier that you didn't  
16 know and Joe didn't tell you that there was a wound;  
17 correct?

18 A. Correct.

19 Q. But this had been in the notes since  
20 December the 9th. Do you agree with that?

21 A. Yes.

22 Q. Do you think you should have checked the  
23 file at some point or checked the chart when you were  
24 rounding on the patients?

25 A. It was not my habit to check every patient's



1 chart because, like I said, we had so many patients.  
2 In between seeing new patients and being in the  
3 operating room, I did not have the time to check every  
4 chart. So I relied on the residents to give me new  
5 information and keep me updated on the patients.

6 Q. You would have been rounding with other  
7 individuals each day and seen this patient each day,  
8 at least during the regular work week?

9 A. We rounded as a team, yes.

10 Q. Right. So I mean every day you would have  
11 rounded as a team and seen this patient?

12 A. We would go in the room and lay eyes on the  
13 patient, yes.

14 Q. When you say "the team," does that include  
15 the attending physician every day, too?

16 A. Yes. We usually -- the patient is usually  
17 seen in the morning three times: first by the intern,  
18 then by the entire resident team, and then the team  
19 with the attending.

20 Q. So most days you would have seen this  
21 patient twice?

22 A. Yes.

23 Q. Do attendings typically check the charts  
24 prior to consulting with the patients each morning and  
25 rounding?

1           A.       Not typically. Not on patients that are on  
2 the floor like this.

3           Q.       I'm only going off of experiences I've had.  
4 My dad had heart failure a few years ago. I spent six  
5 weeks almost every day in the hospital. And I  
6 remember the rounds coming by in the morning, starting  
7 with one person and then an hour or so later there  
8 would be more people than I could count walking into  
9 the room. But typically they'd be looking at a file.  
10 Is there something similar that you all are looking at  
11 for the patients or no?

12          A.       We have a trauma list that has every trauma  
13 patient on it. For trauma it would have the patient,  
14 their injuries, the consult teams. And then the med  
15 students and interns would update with anything new  
16 such as, you know, the patient's weight-bearing status  
17 for physical therapy or anything like that. And  
18 that's what we walked around with. These charts are  
19 all on the computer.

20                   And I'll correct myself. I don't know what  
21 the attendings did because I was not an attending. So  
22 I don't know if they were looking at the chart or not.

23          Q.       This will be the next exhibit. I'm going to  
24 start here at the bottom. Now, this looks like a note  
25 that was entered by Dr. Papin. Do you see that?

1 A. Yes.

2 (EXHIBIT 8 WAS MARKED  
3 FOR IDENTIFICATION.)

4 BY MR. MORGAN:

5 Q. This was on December the 12th of 2016. When  
6 an intern inputs a note into the system, it has to be  
7 also signed by an attending physician; is that  
8 correct?

9 A. Yes.

10 Q. Basically it's kind of a supervision, right,  
11 on the resident?

12 A. Right.

13 Q. So when Dr. Papin enters these notes, it  
14 then, I would imagine, probably sends some sort of  
15 either email or some sort of notification to the  
16 attending physician to review it and state whether  
17 they agree or not with it?

18 A. Yes.

19 Q. Like on this note here, Dr. -- is it  
20 Kutcher? Is that how you say it?

21 A. Yes.

22 Q. He reviewed Dr. Papin's note and agreed with  
23 it. Do you see that?

24 A. Uh-huh, yes.

25 Q. Who is Dr. Kutcher? I know he's a trauma

1 care surgeon here. Just background, is he a very  
2 experienced doctor? What's his kind of background?

3 A. I don't know his specific background. I  
4 enjoyed working with Dr. Kutcher because I thought he  
5 was very knowledgeable and I learned a lot from him.

6 Q. Is it fair to say when these attestations by  
7 the attending physician occurred, this would have been  
8 after the rounds in the morning?

9 A. Yes, it would have had to have been.

10 Q. Because you're sort of affirming what the  
11 resident has seen and then what you saw with your own  
12 eyes when you walked into the room?

13 A. Yes.

14 Q. I'll pull up the next exhibit here. These  
15 are mostly in date order here. I'll go down a little  
16 bit here because this one is again from Dr. Papin on  
17 December the 13th. Do you see this?

18 A. Uh-huh (positive response).

19 (EXHIBIT 9 WAS MARKED  
20 FOR IDENTIFICATION.)

21 BY MR. MORGAN:

22 Q. And here the note from Dr. Kutcher is a  
23 little bit different. I'm going to read it. It says,  
24 quote:

25 "I personally elicited a

1 history from and examined  
2 this patient on rounds on  
3 December the 13th, 2016, and  
4 agree with the findings and  
5 plan as documented in the  
6 linked provider's note."

7 Do you see that?

8 A. Yes.

9 Q. So here Dr. Kutcher is saying he personally  
10 examined this patient; he wasn't just taking  
11 somebody's word for it. Is that accurate?

12 A. Sure, yes.

13 Q. And so were you ever in the room when  
14 Dr. Kutcher would do his own physical examination?

15 A. I have been, yes.

16 Q. Were there times where you would examine the  
17 backside for certain patients that needed that done?  
18 Would the physical examination get to that level?

19 A. Not to that level, no. Not unless it was  
20 indicated that there was a wound. And usually the  
21 attending would not look at it unless I brought it to  
22 their attention and said, you know, the patient has a  
23 wound, I think we need to take him to the operating  
24 room.

25 Q. Now, all of this information that's kind of

1 here that I'm highlighting a little bit, this would  
2 have been information that Dr. Papin would be pulling  
3 in?

4 A. Yes. And then -- where is his physical  
5 exam?

6 Q. I'm just sort of scrolling.

7 A. AA03, that's his physical exam.

8 Q. That would be Dr. Papin's physical exam or  
9 is that the attending's physical exam?

10 A. Dr. Papin's.

11 Q. And it looks like in each of these notes  
12 there's also a section that talks about the wound  
13 care, which would be the most recent wound care  
14 recommendations from the wound care nurse?

15 A. Uh-huh (positive response).

16 Q. Is that correct?

17 A. Yes. It looks like he copied and pasted  
18 their recommendations into his note.

19 Q. Is that normal?

20 A. Every resident does things differently.  
21 It's not abnormal.

22 Q. Have you seen other residents do that as  
23 well?

24 A. Yes.

25 Q. I mean if you saw that for another resident,

1 would you call them out and say, hey, you shouldn't be  
2 doing that?

3 A. No. If I saw this particular note, though,  
4 I would say I see wound care recommendations but  
5 nothing in your physical exam regarding a wound.

6 Q. Is that something that normally would be in  
7 the physical exam section?

8 A. Yes, if there is a wound.

9 Q. Would it say I flipped over and examined  
10 them and nothing there? Or it wouldn't say that  
11 normally?

12 A. Personally, if I do that, I would write it  
13 in my documentation, yes.

14 Q. And during this time when you're the chief  
15 resident, how often are you entering notes like this  
16 into the system?

17 A. I did not. As a chief I did not have to  
18 write daily progress notes.

19 Q. Do you know if you wrote any note for this  
20 patient?

21 A. I don't recall unless it was a -- the notes  
22 I usually write for patients would be not what's  
23 called a daily progress note but kind of a plan of  
24 care, this has acutely happened and this is what we're  
25 going to do about it. If the patient coded and I was

1 there for the code, I would document that in the  
2 chart. I don't remember if I documented on this  
3 patient or not.

4 Q. Is it fair to say if you did, it would be in  
5 the records?

6 A. It should be, yes.

7 Q. I'm going to attach the next exhibit here.  
8 This is the one from December the 14th here with  
9 Dr. Papin and it looks like Dr. Kutcher again.

10 A. Yes.

11 (EXHIBIT 10 WAS MARKED  
12 FOR IDENTIFICATION.)

13 BY MR. MORGAN:

14 Q. The next day he wrote the same thing, that  
15 he also elicited a history from and examined this  
16 patient. Do you see that?

17 A. Yes. We have dot phrases, and that's why it  
18 says the same thing.

19 Q. What do you mean "dot phrases"? What does  
20 that mean?

21 A. We can create an attestation note. And this  
22 is me personally now. When I'm signing a resident's  
23 note, I can hit dot and an attestation, and it will  
24 pull up the phrase that I want used.

25 Q. So kind of a copy and paste of previous



1 language used?

2 A. Yes, it is.

3 Q. Standard language, whatever you want to call  
4 it?

5 A. Yes. It's the same -- whatever wording we  
6 want, we create a dot phrase, and then we can use it  
7 in our notes.

8 Q. I would certainly hope, though, that the  
9 note would be truthful, like Dr. Kutcher did actually  
10 examine this patient; right?

11 A. Yes.

12 Q. I'll pull up the next exhibit here from  
13 December the 15th. This one looks -- let me scroll up  
14 a little bit there where the progress notes start here  
15 on December the 15th by Dr. Papin, again signed by  
16 Dr. Kutcher. But this one looks a little bit  
17 different than the one we saw yesterday. This one  
18 just says: "I agree with the findings and plan as  
19 documented in the linked resident's note."

20 Do you see that?

21 A. Uh-huh (positive response).

22 (EXHIBIT 11 WAS MARKED

23 FOR IDENTIFICATION.)

24 BY MR. MORGAN:

25 Q. Do you agree that's a little bit different

1 than the one we were looking at the last two days  
2 where it said Dr. Kutcher personally elicited a  
3 history as well as examined that patient?

4 A. Yes, that's different.

5 Q. So do you know back then at this time was  
6 there that kind of stock language you could use or did  
7 you have to type in what you wanted to actually write,  
8 fully type it out?

9 A. I don't know about the attendings because I  
10 never had to attest notes for residents because they  
11 wouldn't assign those to me. When I would write  
12 notes, I had my own dot phrases that I could use. So  
13 I would think that their attendings did as well, but I  
14 can't speak for Dr. Kutcher.

15 Q. So you had your own dot phrases even back  
16 then four years ago?

17 A. Yes.

18 Q. And how does it work in real life? Is it  
19 something you just have memorized and you know to type  
20 it out or you hit like a shortcut link on the keyboard  
21 and it pops up?

22 A. So, for example, if I want to write a -- if  
23 I'm writing an attestation now on a resident's note, I  
24 have previously written one that says something  
25 similar to what Dr. Kutcher is saying. I sign a name,

1 which for me is MMATTEST. And so when I read the  
2 patient's note at the end of the day, I hit the  
3 attestation button and then I put dot MMATTEST, and it  
4 pops up whatever I had previously written so that I  
5 don't have to retype it every time.

6 Q. Almost like the computer sort of remembers  
7 what your previous typing had been?

8 A. Yeah. It's like a clipboard essentially  
9 that's permanently stored.

10 Q. Got it. And is that something that you  
11 create for your own personal kind of profile yourself  
12 or it's just a normal thing that the hospital has, a  
13 clipboard for all the physicians?

14 A. There are -- we use Epic. There are  
15 Epic-generated phrases. And then we can make our own.

16 Q. I'm going to mark the next exhibit here --  
17 I'll skip over one and go to two days later, which  
18 would be December the 17th here. Do you see that note  
19 here entered December the 17th?

20 A. Yes.

21 (EXHIBIT 12 WAS MARKED  
22 FOR IDENTIFICATION.)

23 BY MR. MORGAN:

24 Q. Now, this one was cosigned by Dr. Batson.  
25 Do you know who Dr. Batson is?

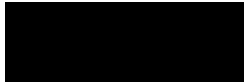
1 A. Yes.

2 Q. Who is Dr. Batson?

3 A. She's another trauma/critical care, acute  
4 care surgeon that's an attending.

5 Q. Experienced attending physician?

6 A. Uh-huh, yes.

7 Q. And so she writes -- she goes on top of  
8 Joe's note here and says that she also saw   
9 today and she agrees with the resident's note. Do you  
10 see that?

11 A. Yes.

12 Q. When you're doing these attestations, you  
13 just kind of quickly summarize and look through the  
14 note that the resident has written? How long does it  
15 take to do these attestations?

16 A. It takes a good while. It takes me a good  
17 while. I can't speak for Dr. Batson and Dr. Kutcher.  
18 But the way I do it is we round in the morning. I  
19 make notes specifically for the things that we're  
20 addressing that day. A lot of the residents will  
21 forward the note from the previous day so you'll see  
22 the same wording, same physical exams unfortunately.  
23 So I will look through the notes, make sure that they  
24 have addressed the topics that we discussed for that  
25 day, and then, if something is blaringly wrong, I will

1 fix it. And then in my attestation, even if they have  
2 said it below, I put what we discussed during rounds.  
3 That's how I do it.

4 Q. Do you have any insight as to how Dr. Batson  
5 or Dr. Kutcher did theirs?

6 A. No, I do not.

7 Q. We're attaching the next exhibit. This is  
8 the one from December the 18th, again signed by  
9 Dr. Batson. She says:

10 "I saw [REDACTED] with the  
11 resident. We discussed the  
12 plan. I agree with the  
13 resident's note."

14 So when it says "we discussed the plan,"  
15 that would be what you were sort of describing a  
16 minute ago, the sort of plan of treatment and care  
17 that would be provided to the patient?

18 A. Yes. The plan for that day typically is  
19 what that means.

20 (EXHIBIT 13 WAS MARKED  
21 FOR IDENTIFICATION.)

22 BY MR. MORGAN:

23 Q. Earlier we were talking about there was  
24 another resident named Will Bruch. Do you remember  
25 that?

1 A. Yes.

2 Q. Was there also another individual named Will  
3 Bruch, B-R-U-C-H?

4 A. I believe it was just Will Bruch. I'm not  
5 sure of his last name. I don't recall two different  
6 people, though.

7 Q. How do you think he spelled his last name?

8 A. I want to say it was B-R-U-C-H, but I don't  
9 remember.

10 Q. Would he have seen this patient during this  
11 time as well?

12 A. He could have. Typically the residents saw  
13 their patients, the same patient every day. And then  
14 anybody that was new, they divvied them up.

15 Q. So for the first years typically you're not  
16 doubling up on the same patient?

17 A. No.

18 Q. Now, what about like weekends when you  
19 rotate? Would that be a time when one intern may see  
20 somebody else's patient?

21 A. Yes.

22 Q. So here if Dr. Papin was assigned this  
23 patient, Will Bruch may have seen him on the weekends?

24 A. Yes.

25 Q. And we have the next day here, December

1 19th, 2016. Again, Dr. Batson also would have seen  
2 the patient with Dr. Papin; correct?

3 A. Yes.

4 (EXHIBIT 14 WAS MARKED  
5 FOR IDENTIFICATION.)

6 BY MR. MORGAN:

7 Q. And you would have been there for both of  
8 them, the first round as well as the round with the  
9 attending?

10 A. Yes.

11 Q. Okay. Here's the note for December 20th,  
12 again signed by Dr. Batson. A little bit different  
13 but similar language:

14 "I saw [REDACTED] with the  
15 resident on 12/20. We  
16 discussed the plan during  
17 rounds. I agree with the  
18 resident's note."

19 So again, the attending would have seen this  
20 patient?

21 A. Yes.

22 (EXHIBIT 15 WAS MARKED  
23 FOR IDENTIFICATION.)

24 BY MR. MORGAN:

25 Q. I'm going to show you the next one here.

1 This is for December 21st there. Here Dr. Batson  
2 says: "Late entry for 12/21." Do you know what that  
3 would mean?

4 (EXHIBIT 16 WAS MARKED  
5 FOR IDENTIFICATION.)

6 A. It looks like she attested on 12/22.

7 BY MR. MORGAN:

8 Q. Which was the next day?

9 A. Which is the next day.

10 Q. Could it just be that she said, hey, this is  
11 a late entry for the day before because she just, for  
12 whatever reason, could not get to the attestations  
13 that day?

14 A. That's how I read that, yes.

15 Q. I would imagine that's maybe not a normal  
16 thing but not an abnormal thing to occur?

17 A. Huh-uh (negative response).

18 Q. Okay. I'm marking the next exhibit. This  
19 is for December 22nd, 2016, again with Dr. Papin and  
20 Dr. Batson signing on it, where she again saw  
21 Mr. Newsome with Joe as well as with you and others;  
22 correct?

23 A. Yes.

24 (EXHIBIT 17 WAS MARKED  
25 FOR IDENTIFICATION.)



1 BY MR. MORGAN:

2 Q. Now, this one I wanted to point out the date  
3 of service that's right here, that would be the time  
4 that you're actually seeing the patient; correct?

5 A. No. That was usually when the note is  
6 started.

7 Q. So if it started here and then looks like  
8 filed -- it says date of service, 7:51 a.m. and filed  
9 7:55.

10 A. Right. It looks like he started the note at  
11 7:51 and then four minutes later signed it.

12 Q. So by 7:51 that morning you would have done  
13 the rounds?

14 A. Not necessarily, no. The residents could  
15 start their notes prior to rounding.

16 Q. But by this point in time Dr. Papin would  
17 have seen this patient on that day?

18 A. I would assume so, yes.

19 Q. Now, the next exhibit -- this is also on  
20 December 22nd, and it looks to be a couple of hours  
21 later. Do you see that?

22 A. Yes.

23 (EXHIBIT 18 WAS MARKED  
24 FOR IDENTIFICATION.)

25 BY MR. MORGAN:

1 Q. And this was a note entered by Kisha Dyse  
2 who was the wound care nurse that we were talking  
3 about earlier; is that correct?

4 A. Yes.

5 Q. Now, it says here this consult was ordered  
6 by Dr. Robertson again.

7 A. Well, that -- I haven't seen a note from  
8 Dr. Robertson in here. So the nurses on the floor,  
9 since they bathe the patients, they're usually the  
10 first ones to see these sacral wounds. That's why I  
11 have the residents every week turn the patient over so  
12 that we are actively involved. So because of that,  
13 the nurses have been given the -- I don't know about  
14 the right -- but the opportunity to place orders for  
15 wound care. So, you know, a nurse could have seen  
16 this wound and then placed a wound care consult order  
17 under Dr. Robertson's name.

18 Q. That's what I was going to ask. I was going  
19 to ask you those same questions. I hadn't seen  
20 Dr. Robertson's notes or attestations, so could it be  
21 just that whenever you -- I would assume you go on the  
22 computer program somewhere specifically to order a  
23 wound care consult?

24 A. Yes. Typically the way this works is  
25 Dr. Robertson may have been the one that admitted this

1 patient initially, so her name is put as the admitting  
2 attending, and then they all rotate every week. But  
3 when orders like wound care -- when the nurse places a  
4 wound care order, it goes under Dr. Robertson's name  
5 because she was the initial admitting attending even  
6 though she had not seen the patient since that first  
7 night.

8 Q. I want to go back to the one we were just  
9 looking at a second ago. This was the one with  
10 Dr. Papin. Now, here it says kind of something new.  
11 It says "febrile overnight." Do you see that?

12 A. Uh-huh (positive response).

13 Q. What does that mean?

14 A. It means the patient had a fever.

15 Q. If you could, kind of just -- this first  
16 sentence here, could you sort of put this into normal  
17 layman's terms of what this means in the note?

18 A. The NAEON means no acute events overnight.  
19 And then he says: "Febrile overnight." So I would  
20 call that an acute event. But the patient had a fever  
21 overnight. Whoever was notified then ordered a  
22 urinalysis, a urine culture, and a respiratory  
23 culture. BAL is respiratory.

24 Q. And what are those items?

25 A. They're specimens that we take the blood,

1 urine, and then sputum. And then we send it to  
2 Microlab so that they are able to test for any  
3 bacteria. And typically if the patient has a fever,  
4 we get the culture, start them on antibiotics, and  
5 then wait for the cultures to return, and then tailor  
6 the antibiotics specific for the cultures.

7 Q. How long does it take for those cultures to  
8 return.

9 A. Usually within five days we have the final  
10 cultures. But the patient has been on antibiotics the  
11 entire time.

12 Q. So this would have been a note entered by  
13 Dr. Papin that morning. So obviously the culture  
14 results wouldn't have been known at that point in  
15 time. They had just been taken.

16 A. There may have been a preliminary but  
17 obviously not final.

18 Q. When you say "preliminary," what does that  
19 mean?

20 A. Preliminary means that -- every day they  
21 will check the cultures. And if something new has  
22 grown, they'll update it in the Epic chart, in the  
23 medical record chart. So usually the first day you  
24 might see a gram stain result saying gram-positive  
25 cocci, which is just the type of bacteria. And then

1 by day 5 you should have the actual bacteria name as  
2 well as the sensitivities for which antibiotics will  
3 treat that appropriately.

4 Q. Are there times where nothing is growing for  
5 that first day and it's hard to tell what it is?

6 A. If the patient doesn't have an infection,  
7 usually you can typically not see anything. Blood  
8 cultures and sputum cultures, I would say within 24  
9 hours you usually have something there. But it's very  
10 basic and it doesn't change our care plan.

11 When he says -- can I look at that note  
12 again?

13 Q. Sure. (Complying.)

14 A. Okay. I believe this patient was nonverbal,  
15 so I don't know how they would deny shortness of  
16 breath or chest pain.

17 Q. There was the note from Dr. Kutcher where he  
18 said he personally elicited history from the patient.  
19 Do you recall that?

20 A. I'm confused. This says [REDACTED]

21 Q. It does.

22 A. But at the top it says [REDACTED]

23 Q. Yeah. I don't know why that is because I  
24 believe [REDACTED] is the patient.

25 A. Yeah. Okay.

1 MR. MORGAN: Tommy, do you know why that is?

2 MR. WHITFIELD: Actually I do. I didn't  
3 know if you wanted me to chime in or not.

4 MR. MORGAN: Sure.

5 MR. WHITFIELD: As a gunshot wound, he was  
6 checked in under an alias name so that way the other  
7 people couldn't come and find him and finish the job.

8 THE WITNESS: I just wanted to make sure we  
9 were looking at the right documentation. Because that  
10 person was nonverbal, so he couldn't have denied  
11 shortness of breath or chest pain.

12 BY MR. MORGAN:

13 Q. You're saying [REDACTED] was?

14 A. Right. I don't remember ever being able to  
15 communicate with him.

16 Q. So is Dr. Kutcher's note incorrect earlier  
17 when he said he personally elicited testimony from --  
18 or history from the patient?

19 A. I'm not sure if that's what he said. I just  
20 want to make sure we're talking about the right  
21 patient.

22 Q. Do you remember this decubitus ulcer patient  
23 that ultimately turned surgical?

24 A. Yes.

25 Q. So your memory is that this patient was

1 nonverbal?

2 A. Yes.

3 Q. I'm just going to go back to one of the  
4 previous notes here. This is the December 14th note  
5 here where you see Dr. Kutcher saying: "I personally  
6 elicited a history from and examined this patient."

7 I take that to mean he talked to the  
8 patient. Do you take that a different way?

9 A. I take that as he got the history from Joe,  
10 from the provider's note.

11 Q. And what do you base that off of?

12 A. That's how I'm reading it.

13 Q. But I mean it's going to be based on  
14 something because it doesn't say he elicited a history  
15 from the resident or from Joe.

16 A. The way I attest notes is I say that I  
17 personally got the history from the resident. But it  
18 doesn't necessarily have to say that. That's who is  
19 giving you the story. We don't always talk to the  
20 patient and get a full history. And then he examined  
21 this patient. That's how I'm reading this, that he's  
22 agreeing with the resident's note.

23 Q. When you say that this patient, you believe,  
24 was nonverbal, does that just mean he couldn't speak  
25 back?

1 A. Right.

2 Q. Could he shake his head yes or no?

3 A. I don't remember that.

4 MR. WHITFIELD: Hey, Ryan?

5 MR. MORGAN: Yes?

6 MR. WHITFIELD: I don't want to like slow  
7 down your train. But if you get to a spot in about 10  
8 minutes or so, a good stopping point, I need to make a  
9 phone call. So whenever you get to a good point, I'd  
10 like to take a break.

11 MR. MORGAN: Okay. Yeah. Give me like five  
12 minutes.

13 MR. WHITFIELD: Sure.

14 BY MR. MORGAN:

15 Q. I want to go back to -- this is the Kisha  
16 Dyse December 22nd note. So she came back and did  
17 another wound care assessment on December 22nd;  
18 correct?

19 A. Yes.

20 Q. And she again reassessed it as an  
21 unstageable pressure ulcer. Do you see that?

22 A. Yes.

23 Q. So what happens -- so this note gets entered  
24 in by Kisha. Does the team just review the note?  
25 What happens once this note goes in?



1           A.       What should happen is when the resident gets  
2 there in the morning -- when the intern gets there in  
3 the morning, he looks through notes to collect  
4 anything from wound care, orthopedic surgery, any  
5 other consulting services, gets their recommendations,  
6 puts it in his note, and then tells us about it at  
7 rounds.

8           Q.       So would you have been told about this at  
9 rounds?

10          A.       I should have been, yes.

11          Q.       Do you think you were?

12          A.       No.

13          Q.       Why do you not think that?

14          A.       My first knowledge of the patient's wound  
15 was when he sent me a text message on his last day in  
16 the service saying that wound care recommendations  
17 were in for an early sacral wound on Mr. [REDACTED].

18                 MR. MORGAN: Let's go ahead and take that  
19 break. Tommy, how long do you need for your phone  
20 call?

21                 MR. WHITFIELD: I'm not sure. I just got a  
22 note I have a client that something happened out at  
23 the med center that I need to check in on.

24                 MR. MORGAN: Okay.

25                 MR. WHITFIELD: I'll call back in as quick

1 as I can.

2 MR. MORGAN: Okay. We'll take at least five  
3 minutes.

4 (A RECESS WAS TAKEN FROM 4:10 P.M.  
5 TO 4:20 P.M.)

6 BY MR. MORGAN:

7 Q. Going back to the December 22nd Kisha Dyse  
8 note again, when a wound care nurse is reviewing these  
9 types of wounds, you would agree with me that they  
10 have the training and the knowledge to know whether a  
11 wound is infected or not?

12 A. Yes.

13 Q. So if it was infected, we would certainly  
14 hope that it would be listed in the note?

15 A. That may be difficult to ascertain if they  
16 can't see below that black eschar stuff.

17 Q. But if they had a question or if they  
18 thought there was some sort of infection, I would  
19 imagine they would bring that to somebody's attention?

20 A. I would imagine so, yes.

21 Q. That's a fairly -- that sets off alarm bells  
22 when you have an infection; is that fair to say?

23 A. Yes.

24 Q. So here there's no -- at least how I'm  
25 reading it, I don't see any noting or discussion of

1 there being any possible infection; correct?

2 A. I don't see her using that.

3 Q. I think I asked this earlier. I just don't  
4 remember what your answer was. Did you know that  
5 Kisha Dyse and the wound care team were doing these  
6 consults with this patient?

7 A. Not at the time, no.

8 Q. It wasn't until after this time when the  
9 surgery occurred?

10 A. No. After Joe told me that wound care  
11 recommendations were in for this early wound, I went  
12 and looked in the chart and realized that there were  
13 multiple wound care notes or more than one.

14 Q. I think I have that text here, the next  
15 exhibit. It looks like a text message between you and  
16 Joe. And it says here: "Wound care recommended  
17 continuing SANTYL for [REDACTED]'s early sacral decub."

18 Do you see that? Did I say that right,  
19 "decub"? Is that how you say it?

20 A. Yes.

21 (EXHIBIT 19 WAS MARKED  
22 FOR IDENTIFICATION.)

23 BY MR. MORGAN:

24 Q. That was the text message you were just kind  
25 of referring to?

1           A.       Yes.

2           Q.       Do you remember when you got this did you  
3 immediately go run to the chart and look or was it  
4 more of a, hey, let me go back and look when I get a  
5 chance?

6           A.       No.    Because it's a typical -- you know,  
7 like we said, it's not uncommon for patients to get  
8 sacral wounds.   So he had been telling me that there  
9 wasn't one.   And then when he said there's an early  
10 sacral decubitus, I said:   Okay, now the patient has  
11 one, we'll look at it on rounds tomorrow.   It's not an  
12 emergency situation to go look at it right now.

13          Q.       Okay.   So you got this text.   Is it fair to  
14 say you didn't drop what you were doing and go review  
15 Mr. [REDACTED] ?

16          A.       Right.   I made a note to look at it the next  
17 day on rounds.

18          Q.       And then he has another text about updates  
19 on patients.   And then you responded that, hey, come  
20 to the lounge, and it looks like you'd be running the  
21 afternoon list.   Is that fair to say?

22          A.       Right, yes.

23          Q.       This would be the kind of end-of-the-shift  
24 review we were talking about earlier, which for some  
25 patients may be real easy, quick, nothing new to

1 update?

2 A. Right.

3 Q. Do you remember talking about this patient  
4 here, Mr. [REDACTED] on this afternoon list? Because  
5 you would have known by this point that wound care had  
6 been called; correct?

7 A. Correct.

8 Q. Do you remember thinking, oh, we need to go  
9 check that now or we'll just check in the morning?

10 A. No. Like I said, because he said early  
11 sacral decub, at this point I thought: Okay, the  
12 patient now has a wound and we'll look at it tomorrow.  
13 It wasn't -- it didn't set off alarm bells at the time  
14 to me.

15 Q. When did it set off alarm bells to you?

16 A. When I looked at the sacral wound the next  
17 day on rounds and actually saw the wound in person.

18 Q. Were you the one who peeled back the scab or  
19 was that somebody else?

20 A. I don't recall. I may have. I don't really  
21 remember. I typically do pick at wounds when I see  
22 them, but I don't remember exactly what I did with his  
23 wound, no.

24 Q. I'm going to share the next -- this is kind  
25 of a continuation of the text message here where it

1 looks like the next morning on December 23rd you  
2 texted back to Joe asking: "Who is the one with the  
3 wound, [REDACTED] or [REDACTED]?" Do you see that?

4 A. Yes.

5 (EXHIBIT 20 WAS MARKED  
6 FOR IDENTIFICATION.)

7 BY MR. MORGAN:

8 Q. And then he responded back that it was  
9 Newsome and whatnot. And you didn't respond to this  
10 text message, it looks like; correct?

11 A. Correct.

12 Q. Four days later you were texting him about  
13 meeting in a different patient's room, it looks like?

14 A. When I sent that text, I distinctly  
15 remember -- at this point I had seen the patient's  
16 wound and something didn't seem right to me. And I  
17 wanted to make sure that I was understanding what he  
18 had said, and I didn't want to try and point fingers  
19 at this point.

20 Q. So at 9:07 that morning you had not yet seen  
21 this patient?

22 A. No. I had seen the patient by this point.

23 Q. But you were asking which one -- you were  
24 asking, between two patients, which one it was. Do  
25 you see my point?

1           A.       Right. I was -- alarm bells had gone off.  
2 At this point was when I started to feel that he had  
3 lied to me. So I sent him the text just to make sure  
4 that he had actually talked about Mr. [REDACTED]

5           Q.       Well, he had because he had sent you the  
6 text the day before.

7           A.       Right.

8           Q.       And then he responded right away to you on  
9 this morning of December 23rd?

10          A.       Right. That text from me on December 23rd  
11 was: Something is not right here, I think he's been  
12 lying to me.

13          Q.       Well, it doesn't say that in the text, does  
14 it?

15          A.       No. Because I'm not going to come out and  
16 say that, start pointing fingers immediately. I had  
17 to investigate.

18          Q.       Is it fair to say when you read your text  
19 the morning of December 23rd, it looks like you're  
20 asking him to confirm which patient it is, that you're  
21 not even sure which patient has the wound?

22          A.       That's what it looks like, but I remember --  
23 I remember seeing the patient that morning and sending  
24 this text message. I know that's odd to say, but I  
25 do.

1 Q. And how do you remember that?

2 A. Just because I remember seeing the wound and  
3 being shocked at how progressed it was and knowing  
4 that he had told me there was not a wound. And I  
5 didn't know -- you know, I knew that this patient was  
6 going to need some surgical debridement. So I was  
7 upset that the patient had a wound that size at that  
8 point and I did not know about it.

9 Q. I want to ask you what you just said a  
10 second ago, that he told you -- Joe told you that this  
11 patient did not have a wound. Did he physically say,  
12 verbally say, this person doesn't have a wound? Or  
13 did he just not mention it? Because those are two  
14 different things.

15 A. So on Mondays, on our turnover Mondays, I  
16 would ask them during our rounds if the patient --  
17 does the patient have a backside wound, a sacral  
18 wound, and he would say no. So in my mind the patient  
19 did not have a wound until the 22nd when he said there  
20 was an early wound. And then when I saw it on the  
21 23rd, I realized that this was a lot worse than I  
22 thought it was.

23 Q. If you could, let's walk through that 23rd  
24 when you're saying you realized it was way worse than  
25 what you thought it was. If you could, let's do the



1 chronology when you first came in in the morning. Who  
2 did you speak to, what did you do to see this wound  
3 for what it was?

4 A. I don't remember the chronology of what I  
5 did. But you have moments when you're a doctor that  
6 stick with you. And the moment I turned this patient  
7 over and I remember seeing how large it was has stuck  
8 with me. So I don't remember what I did when I came  
9 in that morning or anything like that.

10 Q. Who else was with you in the room when you  
11 turned the patient over?

12 A. I do not know.

13 Q. Would there be a note of you doing that,  
14 turning the patient over and making that assessment?

15 A. Probably not from me. I don't recall,  
16 though.

17 Q. Do you recall if there was anybody else in  
18 the room with you?

19 A. There would have had to have been because I  
20 can't turn a patient that size by myself.

21 Q. You just don't remember specifically who it  
22 was?

23 A. No, I don't.

24 Q. Do you think it would have been the round  
25 where it's with the attending physician or the first

1 round without the attending physician?

2 A. It would have been the first round. Because  
3 I had already made a note to look at it. So my plan  
4 was to look at it during the round and then be able to  
5 report it to our attending.

6 Q. This will be attached as the next exhibit.  
7 This is the note for the morning of December the 23rd.  
8 It looks like this was entered by Ronnie Brown. Do  
9 you know who that is?

10 A. Yes.

11 Q. Who is Ronnie Brown?

12 A. He's a nurse practitioner on the trauma  
13 service.

14 (EXHIBIT 21 WAS MARKED

15 FOR IDENTIFICATION.)

16 BY MR. MORGAN:

17 Q. Why did he enter this note and not another  
18 resident?

19 A. Occasionally the nurse practitioner --  
20 because there's so many patients, we do have nurse  
21 practitioners that have random days where they come in  
22 and help see patients. And they will help divvy up  
23 the patients on the floor in the morning with the  
24 interns.

25 Q. Could it also be just because -- I know

1 during the holidays there's times where residents get  
2 a week off for Christmas and then the other half get  
3 the week off for New Year's?

4 A. No. They have their own schedule when they  
5 come in. There was two of them, I believe. And it  
6 was a very random schedule. I never really knew if we  
7 were going to have a nurse practitioner unless I  
8 looked at the schedule. It wasn't a day-to-day thing.  
9 But if they were there, they would see some of the  
10 patients and split them up with the interns.

11 Q. Now, this note signed by Dr. Carroll, who is  
12 Dr. Carroll?

13 A. He's another trauma/critical care surgeon,  
14 kind of the equivalent of Dr. Kutcher and Dr. Batson.

15 Q. Okay. Looking at this note, does this jog  
16 your memory at all of who may have been with you in  
17 the room when you saw this wound?

18 A. Keith may have been.

19 Q. And that's the nurse practitioner?

20 A. Yes.

21 Q. I notice it's Ronnie, but it sounds like he  
22 goes by his middle name, Keith?

23 A. Keith, yeah.

24 Q. Do you remember Dr. Carroll being there at  
25 all?

1           A.       Not when I -- I don't recall him being there  
2 when I first saw the patient, no.

3           Q.       Do you remember discussing the patient with  
4 Dr. Carroll?

5           A.       I would have discussed it, but I don't  
6 remember discussing what we said.

7           Q.       On that 23rd you say you have a very vivid  
8 memory of turning the patient over and seeing the  
9 wound. Do you have any other memories from that day  
10 of anything else regarding this patient?

11          A.       I remember being angry that he -- and  
12 shocked that he had a wound when I did not -- I had  
13 been told for the past two Mondays that there was no  
14 wound there. And when I saw it, just based on  
15 experience, I felt that this did not happen overnight  
16 and this was not an early sacral wound as Joe had said  
17 in his text the previous day. So I was frustrated and  
18 upset with Joe, you know. The text I sent to him  
19 was -- I really just wanted to say: What have you  
20 done? But, you know, I wanted to make sure that we  
21 were talking about the right patient, you know. I  
22 wouldn't say I was trying to give him an out, but  
23 maybe I was trying to give him an out for lying -- or  
24 what I felt was lying to me.

25          Q.       What do you mean by "giving him an out"?

1 I'm not following. I'm sorry.

2 A. To come clean. You know, like I said  
3 earlier, occasionally interns will get nervous about  
4 certain situations and spout out yes or no to  
5 questions even though that may be inaccurate. So I  
6 feel like there's good teaching moments when an intern  
7 does that because you can go back and say, you know:  
8 This does not look like it's what you said it was, do  
9 you want to repaint this? Or let's talk about it.

10 So I was trying to give him an opportunity  
11 to say: Oh, no, sorry, it was, I guess, [REDACTED], just  
12 to give him --

13 Q. That would have been lying even more; right?  
14 If he had said [REDACTED], that would have been lying  
15 completely?

16 A. Well, I feel like he had lied completely  
17 anyway. But I was trying to give him an opportunity  
18 to say, you know -- be some kind of wound or something  
19 besides what he said.

20 Q. But the day before this he had said in that  
21 December 22nd text: "[REDACTED]s early sacral decubitus  
22 wound."

23 A. Right. I may not be understanding what  
24 you're trying to ask me.

25 Q. I guess I'm trying to understand is when

1 you're saying you were trying to give him an out, what  
2 that means when you're asking him which patient it  
3 was.

4 A. Rather than saying: Joe, I feel like you've  
5 been lying to me for two weeks about this patient, I  
6 phrased it as a question for him to say, you know: It  
7 is [REDACTED], I'm sorry, I have not been looking at the  
8 patient's backside, he obviously does have a wound.

9 Q. Okay. So when you noticed this wound on the  
10 morning of the 23rd, what was your -- what was your  
11 course of action? What did you do next?

12 A. I don't remember the exact steps. I know  
13 after I saw it, I went in the hallway and -- you know,  
14 just random memories that you hold onto. And I  
15 remember texting him, sending that text at the nurses  
16 station.

17 But then we would have finished our rounds.  
18 And I guess we were rounding with Dr. Carroll that  
19 day. I would have told Dr. Carroll about it.

20 Q. Do you remember discussing with anybody  
21 else, any of the other nurses, nurse practitioners,  
22 anybody else who had been treating that patient  
23 whether they had noticed it?

24 A. I may have, but I don't recall.

25 Q. I mean as part of the wound care team's

1 recommendation, it was a daily changing of the  
2 dressings; correct?

3 A. Right.

4 Q. And typically that would have been something  
5 done by nurses; correct?

6 A. Correct.

7 Q. And so the nurses would have seen this wound  
8 daily?

9 A. Yes. But they had different nurses. So I  
10 may have asked the nurse that day if she knew about  
11 it. But typically the nurses are different day and  
12 night and day to day. So I wouldn't have been able to  
13 ask every single nurse.

14 Q. If a nurse saw a wound growing -- and that's  
15 kind of what we have here; right? We've seen from  
16 November through December 22nd now this wound getting  
17 larger. Would you agree with that?

18 A. Yes.

19 Q. When nurses are seeing this daily, don't  
20 they have some responsibility to also call this to a  
21 doctor's attention?

22 A. I can't assign responsibility to the four  
23 nurses. I don't know that they've had that kind of  
24 training to --

25 Q. What about the wound care --

1           A.       To my knowledge, what they're responsible  
2 for is if they see something, that they can either  
3 tell us or get wound care involved, which is what  
4 happened with this patient, wound care got involved.

5           Q.       Now, wound care -- which we've gone through  
6 a few different wound care notes showing a  
7 progression. Doesn't wound care have some  
8 responsibility if they see it getting worse to also  
9 bring it to a doctor's attention?

10          A.       I can't speak for them either. But the  
11 documentation going into the chart, I would feel, is  
12 them alerting us.

13          Q.       Has there ever been a time with the wound  
14 care team where one of the wound care nurses has come  
15 to you or another doctor that you've personally  
16 witnessed where they said: Hey, we've got a bad one,  
17 kind of alarm bells-type thing going off that we were  
18 talking about earlier?

19          A.       I have that relationship with my wound care  
20 nurses here, but I don't recall that necessarily being  
21 the typical protocol at UMC.

22          Q.       Do you remember if Ms. Dyse, Nurse Dyse, was  
23 an experienced wound care nurse?

24          A.       I don't know.

25          Q.       But I think you said your testimony was you



1 may have spoken to some of the other nurses about it  
2 that day, but you don't specifically recall?

3 A. I don't recall who I talked to besides the  
4 team and Dr. Carroll. And I don't recall exactly what  
5 we said to each other.

6 Q. But in your mind, you blame Joe?

7 A. In my mind I did not -- I did not blame Joe  
8 for the wound, but I blamed him for not alerting me to  
9 it sooner because that was the expectation set forth  
10 from the beginning, that they would look at the  
11 patient's backside on Mondays and let me know if there  
12 was something there so then I could look at it and  
13 determine the course of action.

14 Q. You don't think any other nurse, any other  
15 resident, any other attending physician has any  
16 responsibility for that?

17 MR. WHITFIELD: Object to the form.

18 BY MR. MORGAN:

19 Q. You can still answer.

20 A. I can't speak to other people's  
21 responsibility. In my opinion, everybody in the  
22 hospital is responsible for patient care. But I put  
23 that task specifically on the interns because -- since  
24 I could not see everybody's backside myself, I was  
25 relying on them to look. So to me it was their

1 responsibility to look as part of our team because  
2 that was what -- that was the duty that they had been  
3 given.

4 Q. Do you think Dr. Kutcher's work on this  
5 patient met the standard of care?

6 A. His standard of care was met because -- I  
7 feel like because he was given the information that we  
8 gave to him. His care plan was based on the  
9 information that we were giving to him.

10 Q. What about for Dr. Batson?

11 A. Same thing.

12 Q. What about for you?

13 A. Same thing. I would not go look at a  
14 patient's backside unless the interns told me that  
15 there was an issue.

16 Q. Do you think Joe met the standard of care?

17 A. No, I do not.

18 Q. Why?

19 A. Because he was told as part of his duties as  
20 an intern to look at the patient's backside. I don't  
21 know if he did or not, but he certainly did not give  
22 me accurate information.

23 Q. How do you know he didn't give you accurate  
24 information?

25 A. Because the patient had a wound even dating

1 back to, that we know of, on December 9th, based on  
2 the wound care notes. Because after I looked at the  
3 note, I looked into the patient's chart and saw that  
4 wound care had seen the patient on the 9th. So when I  
5 asked him that Monday, I guess it was the 12th, this  
6 is the patient, is there a wound, and he said no, then  
7 to me that is inaccurate and lying.

8 Q. So even though -- and I'll go back and I'll  
9 attach it here as a previous exhibit. This is the  
10 November 15th, 2016 note by the first wound care nurse  
11 for this wound, which was ordered by somebody; right?  
12 Somebody noticed this wound to order this; correct?

13 MR. WHITFIELD: Object to the form.

14 A. Uh-huh (positive response).

15 BY MR. MORGAN:

16 Q. Would you agree with me that there has to be  
17 a person who has to order a wound care consult?

18 A. Somebody had to order a wound care consult,  
19 yes. I don't see any pictures to what degree. It  
20 looks like: "Consult received for patient that is  
21 high risk for pressure ulcer development."

22 So I don't know that the patient actually  
23 had an ulcer at that point but that he was high risk.  
24 So nursing wanted to get them involved.

25 Q. Surely here on December 9th by Kisha Dyse,

1 the wound care nurse, we did have pictures?

2 A. Yes.

3 Q. And we do see that there's a wound?

4 A. Yes.

5 Q. So you testified a moment ago that wound  
6 care nurses tell the doctors what's going on by  
7 submitting these notes into the charts; correct?

8 A. Yes.

9 Q. So is it fair to say that during this time  
10 period, you didn't review the chart, and it doesn't  
11 look like any attending physicians reviewed the chart  
12 either. Otherwise someone would have noticed this  
13 wound?

14 A. Right. It is -- as spelled out, at the  
15 beginning of the month, it's the intern's job to look  
16 through the charts to read any consult notes, any  
17 consult recommendations. And then we're alerted to  
18 that. We don't typically -- I didn't typically and  
19 the attending that I know of -- I can't speak for the  
20 attending. But I did not typically go into the chart  
21 unless I was alerted to something or something didn't  
22 seem right to me.

23 Q. So it's a first-year intern's fault for  
24 this?

25 A. It's not the first-year intern's fault that

1 the patient got a wound. It's his fault for not  
2 telling me when I asked him: Does this patient have a  
3 wound? It's his fault for not saying: Yes, this  
4 patient has a wound.

5 Q. Do you ask it like that? I guess I'm still  
6 a little confused about that interplay. Are you  
7 asking him for each patient does this person have a  
8 wound or is it kind of an open question?

9 A. Not usually for each patient. And it's  
10 still my practice today -- except I made it turnover  
11 Tuesdays -- that if a patient has been there for an  
12 extended period of time, they are at high risk to get  
13 a sacral wound. So those patients, I expect them to  
14 turn over on Monday. And on rounds that day I will  
15 say: Is there a wound on the backside?

16 Q. Do you know for this patient was there any  
17 sort of ICARE report or incident report that was ever  
18 filled out for this patient?

19 A. I don't recall. But there should have been  
20 one placed afterward when we discovered this wound.

21 Q. What do you mean there should have been one?

22 A. Because there is a delay in care on this  
23 patient.

24 Q. But to your knowledge --

25 A. I don't know if there was one or not.

1 Q. Do you recall any sort of subsequent  
2 investigation or discussion with anybody at the  
3 hospital about this patient after this kind of  
4 December 23rd time frame?

5 A. I investigated by looking at the patient's  
6 chart just to see what he had written in his daily  
7 progress notes. And that's when I saw the December  
8 9th note. I don't really recall any other discussions  
9 except, you know, talking to Dr. Carroll and then when  
10 I went to Dr. Earl and Renee.

11 Q. Which was then what led to that January 10th  
12 email we looked at in the beginning?

13 A. Right.

14 Q. So you discussed this patient with Dr. Earl?

15 A. Yes.

16 Q. What do you recall about that conversation?

17 A. I don't remember exactly what we said. I'm  
18 sure I told him that the patient had a sacral wound  
19 that was advanced, that we had turnover Mondays and  
20 that I had asked Joe if there was a wound, and he said  
21 no. And that was not a type of wound that would  
22 develop overnight. In my opinion, he had that wound  
23 previously. And then it turns out, looking at the  
24 chart, that even on the 9th he had something there.

25 Q. The same one that the nurses would have seen

1 every day?

2 A. Right. And my concern -- the concern wasn't  
3 the wound when I went to Dr. Earl; it was that Joe had  
4 lied about it to me.

5 Q. Why would he lie to you? If it was there  
6 and he saw it, why would he lie to you when it was in  
7 the chart?

8 A. I can't answer that.

9 Q. When you turned over the patient on December  
10 23rd -- and you said you had that vivid memory of  
11 remembering that -- was the wound infected at that  
12 point?

13 A. You can't really tell if it's infection per  
14 se as far as like pus or anything like that. Whenever  
15 I see that black eschar, just based on experience, I'm  
16 going to assume that there's an infection because that  
17 makes a person a higher risk to set up for infection.

18 Q. What happened to this patient? Did he  
19 undergo surgery?

20 A. He did undergo surgery. He underwent  
21 several, if I remember correctly. He went through an  
22 initial debridement that day and then eventually got  
23 what's called a diverting ostomy.

24 Q. And what is that?

25 A. That's where we -- because the wound is so

1 bad, we feel it won't heal appropriately since it's  
2 near the rectum and will get stool into the wound and  
3 will deter wound healing. So we give them a colostomy  
4 where they poop in a bag to divert the route of stool  
5 away from the wound.

6 Q. I think I asked you this, and I apologize.  
7 Sorry. It's getting late in the day. Do you have a  
8 specific memory of a discussion about this patient  
9 with Dr. Carroll?

10 A. I don't remember. I don't have a specific  
11 memory. But if he was the attending that day, I would  
12 have told him about it.

13 Q. And you recall the discussion later with  
14 Dr. Earl about it but just that one time?

15 A. It may have been more than once. I just  
16 know that when we came back from holidays, I felt the  
17 need to let him know that I felt Joe had lied about  
18 the patient. But I don't recall what was said or how  
19 many times we discussed it.

20 Q. What is a mortality and morbidity report?

21 A. It is -- we call it our M&M. And it's a  
22 conference that we held on Wednesdays to discuss  
23 morbidities, which is adverse events or possibly  
24 preventable events, and morbidities is when we discuss  
25 patients that have died.



1 Q. Was this patient ever discussed at an M&M  
2 conference?

3 A. I don't remember. I believe he was.

4 Q. When would that have been?

5 A. The next year in January or February. We  
6 typically would -- any patient that's presented at M&M  
7 was done within a couple of months.

8 Q. And I imagine there would be records of some  
9 type for those M&M conferences?

10 A. Right.

11 Q. Like there would be a list or there would be  
12 charts and things that were presented to individuals?

13 A. Yes.

14 Q. Who sits in on those M&M conferences?

15 A. The attendings and all the residents are  
16 there, and we discuss the patients.

17 Q. So that's a pretty big group?

18 A. Uh-huh, yes.

19 Q. And so you do or you do not recall if this  
20 patient was discussed at that M&M event?

21 A. I don't recall, no.

22 Q. I'm going to go back to the -- this is the  
23 hearing transcript. This is on page 56 where you're  
24 talking about this patient here. And one of the  
25 examiners had asked you about, quote:

1 "By anything, you mean -- I  
2 mean everybody knew that this  
3 patient had a wound, the  
4 nurses, or did nobody even  
5 know that he had a wound?"

6 Do you see that question?

7 A. Yes.

8 Q. And you responded with just that you did not  
9 know he had a wound; correct?

10 A. Correct.

11 Q. But you did not respond to that question  
12 that nurses would have known about the wound; is that  
13 accurate?

14 A. Right. Because I don't know what nurses  
15 knew or didn't know.

16 Q. But you agreed and admitted earlier that  
17 these nurses would know because they're the ones  
18 changing the dressings daily?

19 A. Right. But I can't speak for them to say  
20 that they knew about this wound.

21 Q. But you could have told that to this  
22 committee?

23 A. I only wanted to speak for myself.

24 Q. But you also expressed to this committee  
25 other events that had been told to you that you had

1 not personally witnessed; correct?

2 A. Say that again.

3 Q. You had expressed to this committee and  
4 testified to this committee about events that were  
5 told to you that you did not see firsthand?

6 A. Correct.

7 Q. So why did you feel like you didn't have to  
8 disclose that the nurses would have seen it?

9 A. Because I did not know if a nurse had seen  
10 it or not. I may be confused.

11 Q. I mean --

12 A. Let me read what she said.

13 Q. Sure.

14 A. (Document review.) It sounds like I was  
15 just speaking for myself, that I didn't know that he  
16 had a wound.

17 Q. Other than the email that we looked at at  
18 the beginning, the January 10th email, did you lodge  
19 any other sort of formal complaint or anything against  
20 Dr. Papin?

21 A. I believe I only took it to Dr. Earl and  
22 Renee.

23 Q. Prior to testifying at the hearing, did you  
24 review any documentation, the records or reports or  
25 anything like that?

1           A.       I don't recall. I'm not sure.

2           Q.       Do you remember if you discussed the  
3 patient, Mr. [REDACTED], with the wound care nurse, Kisha  
4 Dyse?

5           A.       I don't recall that. I don't believe I did,  
6 no.

7           Q.       I think you discussed it -- you said you  
8 discussed it with Dr. Earl. But I think you might  
9 have also discussed it with Renee Greene?

10          A.       I don't know that I necessarily discussed  
11 the wound. I just discussed the situation and that  
12 Joe had lied to me about it.

13          Q.       And what was her response? Just put it in  
14 writing?

15          A.       Yes. I don't recall exactly what she said,  
16 but she obviously told me to put it in writing.

17          Q.       Anything you can recall about that  
18 conversation or her response to you in regard to these  
19 allegations against Joe?

20          A.       No. It's been too long.

21          Q.       Now, do you recall during the hearing you  
22 testifying that a male med student had told you about  
23 how a female med student felt uncomfortable around  
24 Joe?

25          A.       Only what I've read in the transcript.

1 Q. Who was that male med student?

2 A. Will Crews.

3 Q. And do you know who the female med student  
4 was?

5 A. I don't remember her name. She was the  
6 other med student along with Will.

7 Q. Do you remember when Will told you that?

8 A. I don't recall. Only what's in the  
9 transcript.

10 Q. But do you recall -- if you're kind of using  
11 the wound patient as sort of ground zero, right,  
12 December 23ish, was it before this time, was it after  
13 that time?

14 A. I don't remember. It may have been at that  
15 debriefing meeting that we have at the end of the  
16 month. I really don't remember. Because with the  
17 holidays, everybody gets kind of spread out.

18 Q. Now, when you heard that, what was your  
19 response?

20 A. I don't remember.

21 Q. Do you remember thinking: Oh, my gosh, this  
22 is very serious and I need to report this to somebody?

23 A. I feel like I wanted to go talk to her about  
24 it, but I don't remember. It's been so long ago.

25 Q. Do you think you did go to talk to her about

1 it or you don't think you did?

2 A. I don't remember.

3 Q. You would agree with me that allegations of  
4 harassment are serious things?

5 A. Yes.

6 Q. And that if there are allegations of  
7 harassment, they should be reported to Human  
8 Resources?

9 A. Yes.

10 Q. And you agree with me that when you heard  
11 this allegation, you did not report it to Human  
12 Resources?

13 A. I did not go to Human Resources.

14 Q. So you agree that once you heard this  
15 allegation, you did not take it to Human Resources?

16 MR. WHITFIELD: Object to the form.

17 BY MR. MORGAN:

18 Q. You can still answer.

19 A. I did not go to Human Resources.

20 Q. Will Crews, didn't he also tell you that Joe  
21 would be gone for periods of time?

22 A. That's what was in the documents that I've  
23 read. I don't recall our conversation.

24 Q. I was going to say what do you remember  
25 about that and what did you personally witness?

1 A. It's been so long, I don't remember.

2 Q. Do you have any memory or whatnot that Joe  
3 would just disappear during the day?

4 A. I remember there being times where I didn't  
5 know where he was. Because every once in a while I  
6 would go to the third-floor resident workroom, and he  
7 would not be in there. But that didn't -- you know,  
8 he could be anywhere. He could be in the ER, he could  
9 be in a patient's room.

10 Q. But is it fair to say, during his work with  
11 UMC, you personally were not of the belief or had some  
12 suspicion that he was just not working?

13 A. Only what I heard. I never could prove that  
14 he was not there.

15 Q. Did you do anything to double check whether  
16 that was true or not?

17 A. No, not that I recall.

18 Q. Did you ever like check his parking garage  
19 card?

20 A. No.

21 Q. Can you check -- could you go onto the Epic  
22 system or another one of those computer systems and  
23 kind of type in Papin's name and see all the notes and  
24 everything that he's been doing throughout the day?

25 A. I could go into an individual's patient's

1 chart and see if he wrote a note. But I don't know  
2 how I could just look specifically for what Joe did.

3 Q. Did you ask anybody else there when you  
4 heard this allegation from Will Crews if other people  
5 felt Joe was just disappearing for periods of time?

6 A. I seem to remember asking the other intern,  
7 but I don't recall all the conversation.

8 Q. And who was that other intern?

9 A. Will Bruch.

10 Q. Other than the numbering system that we were  
11 talking about before where you would counsel Joe on  
12 what you thought were inappropriate or unprofessional  
13 behavior traits, did you ever give Joe any other  
14 feedback besides that about his performance?

15 A. I don't recall specifically. But it is my  
16 habit to give feedback, positive and negative, to  
17 residents. So I imagine I did.

18 Q. Do you have any specific recollections of  
19 any discussions with Joe about that?

20 A. Not specific, no.

21 Q. Did Joe do anything good?

22 A. I can't recall anything specific. I know  
23 that I gave him some positive feedback, so he must  
24 have at some point. But I don't recall specific  
25 instances, no.



1 MR. MORGAN: I might be just about done  
2 here. Let's just take a few minutes and I'll go  
3 through my outline here.

4 MR. WHITFIELD: All right.

5 (A RECESS WAS TAKEN FROM 5:02 P.M.

6 TO 5:07 P.M.)

7 BY MR. MORGAN:

8 Q. Dr. Mahoney, do you text with Dr. Earl?

9 A. Yes.

10 Q. Did you ever text with Dr. Earl about Papin?

11 A. I don't know. I don't remember.

12 Q. Do you still have those texts with Dr. Earl?

13 A. I believe I only have texts from 2018  
14 because I had to get a new phone.

15 Q. But if we requested those, you could look  
16 and just verify one way or the other how far back it  
17 goes?

18 A. Yes.

19 Q. How did you come to find out that you were  
20 going to testify at the appeals hearing?

21 A. I believe Dr. Earl told me.

22 Q. And what did he tell you about it?

23 A. That there was going to be like an ethics  
24 committee there from the hospital staff that I needed  
25 to tell my side of the story and what I noticed while

1 he was on the service.

2 Q. Did you and he discuss what specific topics  
3 to discuss?

4 A. I don't recall. I'm sure he asked me to  
5 discuss the sacral decubitus patient.

6 Q. Did you have any specific memory of that  
7 conversation beforehand about what he wanted you to  
8 testify about?

9 A. No, I don't.

10 Q. Did you talk to anybody else about that  
11 hearing prior to testifying?

12 A. I don't recall, no.

13 Q. Did you go back and talk to any of the  
14 nurses or med students or other residents or anything  
15 like that?

16 A. I believe I may have talked to Ashley  
17 Griffin because she was at that same meeting. But I  
18 don't remember what we talked about.

19 Q. I was about to ask what did you and Ashley  
20 talk about?

21 A. I don't remember. It's been so long.

22 Q. Do you think you went back and looked at any  
23 of the records or any of your text messages with Joe  
24 before you testified?

25 A. I know I went back and looked at some of our

1 text messages, and I made screenshots of those. I  
2 feel like it was mostly about the sacral wound because  
3 to me that was the biggest issue. To me the critical  
4 issue was I felt he had lied about this patient. So I  
5 did make some screenshots of our text messages.

6 Q. Did you go back and review your January 10th  
7 email?

8 A. I don't recall.

9 Q. Do you know did -- in preparing for that  
10 hearing, did Dr. Earl or Renee or anybody else give  
11 you any sort of documentation to review or outline or  
12 anything like that?

13 A. I don't believe so, no.

14 Q. Was it just a verbal discussion with  
15 Dr. Earl?

16 A. From what I remember, yes.

17 Q. Do you remember talking to anybody else  
18 besides Dr. Earl and Renee about Dr. Papin kind of  
19 between December 23rd and the hearing date?

20 A. I don't believe so. I mean Dr. Griffin was  
21 in my class, and she had worked with him. So that's  
22 why we had discussed it. But I don't recall talking  
23 to anybody else, no.

24 Q. The M&M meetings we talked about, remind me  
25 when do those occur? You said once a month?

1 A. Every week, Wednesday mornings.

2 Q. Oh, sorry. Every week, Wednesday mornings.

3 Okay.

4 So is there like a schedule or an agenda  
5 that is either presented like on a screen or passed  
6 out of the cases to be covered?

7 A. I don't recall the format that we did it  
8 that year. I was in charge of it my fifth year. I  
9 did change around the format a little bit, but I would  
10 just go back and look at things that had been  
11 reported. Every week the patient -- or the chief of  
12 the service is supposed to turn in an M&M list, and I  
13 would get those. I would go through those lists and  
14 then pick patients to discuss. But I can't remember  
15 how we did it that year.

16 Q. I'm just going to make up an example here.  
17 If a chief lists five cases one week but you decide to  
18 only discuss three, what happens to the other two? Is  
19 there still like an investigation that's done or it's  
20 just not discussed at all?

21 A. M&M is a teaching tool. It's not  
22 necessarily a go back and, you know, look and see  
23 every patient. So we would pick patients that we felt  
24 we had a good learning opportunity from and then  
25 discuss those patients. So it wasn't a risk

1 management-type meeting. It was purely educational.

2 Q. Do you know if this patient situation with  
3 [REDACTED] was reported to risk management?

4 A. I did not report it, but I think -- I  
5 believe it was, yes.

6 Q. Do you know who reported it?

7 A. I don't know.

8 Q. Why do you think it was reported?

9 A. When I told Dr. Earl about it -- I mean  
10 before I even went to Dr. Earl, I felt like this was a  
11 critical issue, and mostly just because of the lying.  
12 And that's why I needed to talk to him about it. And  
13 I believe it wasn't so much the wound that was the  
14 problem but it was that we had a provider taking care  
15 of patients in the hospital that neglected to give  
16 information. So I think that -- not that the patient  
17 had a wound that was presented to HR, but it was his  
18 actions.

19 Q. Why didn't you bring this situation to risk  
20 management?

21 A. I don't know. But as a resident, we went to  
22 our program director about things -- about any  
23 problems we had.

24 Q. If you saw some --

25 A. I may have not even known to go to risk

1 management at the time. That's something I've  
2 certainly learned as an attending, but I'm not sure  
3 that I knew to do that as a resident. To me it was to  
4 go to my boss, who was Dr. Earl.

5 Q. And do you know is there a document or some  
6 sort of form or process that has to be started to turn  
7 that into risk management?

8 A. I don't know the steps for UMC, no.

9 Q. What about for the M&M? Is it just the  
10 chief resident list?

11 A. Again, that's separate from risk management.  
12 That's an educational conference. But the chief  
13 residents would make up a list and submit it to me and  
14 Dr. Earl. And then when I was in charge of the M&M  
15 conference, I would go through and pick the cases.

16 Q. When you say the "chief resident," is this  
17 the fifth-year chief resident over everything?

18 A. Whoever the highest-level resident is, yes.

19 Q. So in a situation like this with this  
20 patient, how would that chief resident know to put  
21 Patient [REDACTED] on the list?

22 A. Because it's a sacral wound that we would  
23 want to report. You know, because sacral wounds  
24 happen and they can happen, and we sometimes expect  
25 them to happen, I wouldn't necessarily say that this

1 is something that is just, you know, breaking news, an  
2 educational topic that we have to discuss at an M&M  
3 conference. But, you know, because it is a wound,  
4 then we would have reported it, at least on our M&M  
5 list, and submitted it.

6 Q. But I guess I'm still a little confused of  
7 how the chief resident, who may not have provided any  
8 care to this patient so they may not even know the  
9 situation was happening, how does it get on the list?  
10 Is it something you have to tell them? Somebody else?

11 A. I would have -- as the chief, I would have  
12 put it on the M&M list and said [REDACTED], MRN number,  
13 sacral wound, and then said -- you know, it was more  
14 of an M&M topic to me because it required an  
15 operation.

16 Q. Where is this M&M list? Is it like a  
17 physical list you write on or is it like a computer  
18 internal thing?

19 A. Usually it's something we keep up with on  
20 our notes, and then we do like an Excel or Word  
21 document and then submit it.

22 Q. So then all the chiefs -- like you were the  
23 chief on the trauma team there. You would do your  
24 list, other people would do their list, and then turn  
25 it in to the main chief resident?

1           A.       Right. Or whoever was in charge of the M&M  
2 conference. And I think Dr. Earl would get it as  
3 well.

4           Q.       So for this patient, if there was an M&M  
5 conference -- I think you said you thought there  
6 was -- there should be some sort of record somewhere  
7 that started that process?

8           A.       Correct.

9           Q.       And then when it's presented to the group,  
10 are there records that are shown or is it just a  
11 verbal discussion?

12          A.       Typically a resident will kind of research  
13 the patient, look through the documentation, give the  
14 timeline of things that occurred. If there was an  
15 operation, what the operation was. And then we would  
16 go into up-to-date, current care plans or ways to  
17 treat wounds or whatever the morbidity is of the  
18 current data on it.

19          Q.       So are there notes and records kept of those  
20 M&M conferences?

21          A.       I don't know that they're kept. It's just  
22 what's submitted every week. I don't think that  
23 they're actually kept in a file or anything, though.

24          Q.       Like if I requested all records related to  
25 Patient [REDACTED] with an M&M conference, do you know



1 what records, if any, the hospital should have?

2 A. I don't know that they would have any. It  
3 wasn't -- it wasn't seen as a risk management. So I  
4 feel like if [REDACTED] was presented at M&M, it would  
5 have been more -- not so much this patient had a  
6 sacral wound, because that happens. It would have  
7 been could we have caught this sooner so that the  
8 patient didn't end up with a separate operation of the  
9 diverting ostomy.

10 Q. Do you remember this patient being discussed  
11 at the M&M?

12 A. I don't remember. I don't recall, no.

13 Q. Because you're describing it as a teaching  
14 moment; right? It's an educational moment?

15 A. Correct.

16 Q. So I usually -- I guess what I'm trying to  
17 ask is: Do you remember what the teaching moment was  
18 for this patient? If you don't remember, you don't  
19 remember. But that's what I'm trying to ask, is what  
20 would have been the teaching moment, if you recall  
21 what it was, for this patient?

22 A. In my opinion, I feel that the teaching  
23 moment would be to discuss as a team, you know, being  
24 honest about reporting patient care, patient physical  
25 exams, whatever, and then -- because there was a delay

1 in care for the sacral wound because he had not been  
2 forthcoming with the physical exam information or lied  
3 about it, whatever happened.

4 Q. You're saying "whatever happened." Before  
5 you were adamant that he lied.

6 A. Well, my opinion is he lied about it. So  
7 the teaching moment is don't lie about a patient's  
8 physical exam.

9 Q. Earlier you had testified that there had  
10 been other instances where interns and others haven't  
11 told the truth?

12 A. Not -- not to this degree to where a patient  
13 was affected this much. What I meant by that  
14 statement was, you know, interns could be nervous  
15 about something and I say: Is the potassium okay  
16 today? Yes, when they actually hadn't looked at it.  
17 But, you know, gut reaction is they want to give an  
18 answer. And then we look at it and they not be. So I  
19 say something or they'll go look at it themselves and  
20 say: You know what, the potassium was not correct.

21 But, you know, not to the degree of: I've  
22 asked you twice this Monday and the next Monday and  
23 you told me that there's nothing. In this particular  
24 instance I would say if he said no to me that first  
25 Monday and was lying about it, that I would have liked

1 for him to go say: Oh, I need to go look at this  
2 patient because I didn't, seeing the wound that was  
3 there, and then come back to me and say: Hey, Meagan,  
4 you know, I know I said there wasn't a wound there,  
5 but I went and looked. The patient does in fact have  
6 a wound. And then we would have been monitoring this  
7 on the 12th rather than the 10 days or whatever it was  
8 later.

9 Q. Do you think there was maybe just -- you  
10 guys just didn't get -- you crossed wavelengths or  
11 something like that and weren't communicating right?  
12 Because clearly we saw the notes where Dr. Papin was  
13 noting and copying the wound care recommendations.

14 A. Well, my concern there is that he wasn't  
15 actually documenting it in his physical exam. But I  
16 do know that I asked him: Is there a wound? And he  
17 said: No. Because if he had said yes, there's a  
18 wound, I would have looked at it and we wouldn't be in  
19 this situation.

20 Q. What do you mean "we wouldn't be in this  
21 situation"?

22 A. Well, he wouldn't have -- in my opinion,  
23 that would not be lying to me about it. And that's  
24 the critical issue to me is that he lied to me about  
25 it.

1 Q. And why he was ultimately fired?

2 A. I don't know why he was fired.

3 Q. You don't know why he was fired?

4 A. No, I don't. I don't know what the exact  
5 reasons are, no.

6 Q. When did you first find out that he was  
7 fired?

8 A. I don't remember.

9 Q. Do you remember learning that, though, at  
10 some point?

11 A. Yes.

12 Q. Do you remember who told you?

13 A. Dr. Earl.

14 Q. What did he say?

15 A. I don't remember.

16 Q. Do you remember when it was?

17 A. No.

18 Q. It would have been after the appeals hearing  
19 or was it before that?

20 A. I really don't recall. It must have been  
21 before.

22 Q. We've been talking for, what, 3 hours and 20  
23 minutes, give or take? I always like to ask an  
24 open-ended question. Anything else you can recall we  
25 have not discussed about Dr. Papin --

1 MR. WHITFIELD: Object to the form.

2 BY MR. MORGAN:

3 Q. -- that you remember discussing -- I'll  
4 limit it some. Any sort of negative discussions you  
5 remember having with any other person regarding  
6 Dr. Papin that we have not discussed today?

7 MR. WHITFIELD: Once again, object to the  
8 form. You can answer to the best of your knowledge.

9 A. I don't even remember what we've discussed  
10 today. But no, not that I recall.

11 MR. MORGAN: That's all I've got.

12 MR. WHITFIELD: All right. Briefly, just to  
13 kind of follow up on a few things.

14 EXAMINATION

15 BY MR. WHITFIELD:

16 Q. I'm going to put up my copy of the letter on  
17 the screen so I can manipulate it. But it should be  
18 your Exhibit Number 1, if I can make this work.

19 Can y'all see the January 10th email?

20 A. Yes.

21 Q. Okay. My screen went blank except for the  
22 email, so I didn't know if it had come through.

23 So when you wrote this email -- when did you  
24 write it?

25 A. Well, it looks like January 10th.

1 Q. What year?

2 A. 2017.

3 Q. What year is today?

4 A. 2020.

5 Q. So we're talking over three years ago?

6 A. Yes.

7 Q. Was your memory better of the events back in  
8 2017 or is it better today?

9 A. 2017. A lot has happened since then.

10 Q. So if you put it in the letter back then,  
11 would you have remembered it back then as happening  
12 that way?

13 A. Yes, I would recall -- I would say that this  
14 letter is more accurate than my memory now.

15 Q. And I want to refer you back to number 2 on  
16 the list where you said that you talked to him about  
17 it. Do you see that?

18 A. Let's see. Yes.

19 Q. So when the code came out right at shift  
20 change -- you wrote:

21 "When I talked to him about  
22 it, he said that he heard the  
23 code called overhead as he  
24 was leaving the lounge, but  
25 that he had signed out so he

1 left."

2 Is that what's written?

3 A. Yeah. That's not the conversation in the  
4 text, which it doesn't seem like it was. We must have  
5 talked about it separately. Which it sounds like  
6 something I would have done. Because, you know, I  
7 tried to sit down with the residents and teach and  
8 talk. And sometimes I talk too much to them, I guess.

9 Q. Where is the resident -- where is the  
10 lounge?

11 A. It's on kind of the first floor of the  
12 hospital within 30 seconds of the operating rooms.

13 Q. And from there where is it to 3 North?

14 A. So our lounge is kind of on one side of the  
15 hospital. 3 North is kind of in the middle of the  
16 hospital.

17 Q. But having heard it come off overhead, the  
18 phone to call back to 3 North would be in the lounge?

19 A. Right.

20 Q. So instead of calling in, apparently he  
21 left?

22 A. Correct. You know, and I don't know when he  
23 heard it, if he says in there.

24 He said he heard the code called overhead.  
25 So he was there when the code was called as he was

1 leaving the lounge.

2 Q. What would be the normal expectation for an  
3 intern if they're in the building and they hear the  
4 code called overhead?

5 A. Because of the night float team, that's  
6 probably our worst rotation because it is so busy.  
7 Because the night float team is usually very busy, the  
8 expectation is that you stay to help to see if they  
9 need any help. At least ask: Do you need me to help  
10 you with this? And, you know, it being called as a  
11 3 North code and he being on the trauma service and  
12 that's where the majority of our trauma patients are,  
13 my assumption if I was an intern was that, hey, this  
14 may be one of my patients, let me see what I can do.

15 Q. And in the next little subparagraph of  
16 number 2 you write:

17 "Getting out of here as  
18 fast as possible seemed to be  
19 a theme with him throughout  
20 the month. During afternoon  
21 rounds he would often sigh or  
22 get an attitude when I asked  
23 him to do something. He used  
24 the excuse 'this isn't my  
25 patient' as well."



1                   What are you talking about in that package?

2           A.       I don't remember specific instances. I do  
3 remember that I would feel frustrated in the  
4 afternoon, you know. Because if Will Bruch wasn't  
5 there for some reason, if he was down in the ER or  
6 whatever seeing a patient, I would try to round the  
7 list so that I could get them out of there. It just  
8 seemed like he wanted to get out of there. It wasn't  
9 his patient. And, you know, if I kept wanting to talk  
10 about something, there would be a sigh like, you know,  
11 why are you keeping us here any longer?

12                   I remember him -- sometimes he would come  
13 into those afternoon sessions in his workout clothes  
14 so that he could start working out as soon as he left,  
15 which I thought was a little odd, especially since he  
16 was still on the clock. But he just seemed like he  
17 didn't want to be there, he wanted to get out of  
18 there.

19           Q.       So he had showed up to sign out basically,  
20 already having changed clothes to go work out?

21           A.       Yes.

22           Q.       And if a call had come in at that point,  
23 would he have had to go back to the trauma or whatever  
24 in his workout clothes?

25           A.       I would have expected him to just go in his

1 workout clothes because a patient's life can't wait  
2 for him to change back into his scrubs.

3 Q. And number 3 -- we're back on the logging  
4 cases at the beginning of the month. You said Renee  
5 would reach out to you and say this resident isn't  
6 logging cases?

7 A. Right.

8 Q. And then in your recollection here that you  
9 wrote on January 10th of '17:

10 "He said that he had. And  
11 the last time I asked him, he  
12 went so far as to say that he  
13 had more non-op traumas  
14 logged than any of the other  
15 residents in his year."

16 And you later found out he had not logged  
17 anything since the day in Renee's office. So that  
18 would be the day that Renee told you he had not logged  
19 cases?

20 A. Yes.

21 Q. So he told you he had?

22 A. So I would have -- when I asked him a couple  
23 more times, just to make sure that he was staying on  
24 top of it, mostly so I didn't have to hear Renee talk  
25 to me about it again -- I had enough to do. So I

1 would say: Hey, are you logging your cases? And  
2 apparently at one point he said that he had more  
3 non-op traumas than anybody, which to me is a very --  
4 that's not just saying yes, I have been. It's going a  
5 step further and saying: Yes, actually. So to me it  
6 seems like a very -- if he was not logging cases, that  
7 is an above-and-beyond exaggeration.

8 Q. But after him telling you that, did you find  
9 out that he had in fact not logged cases?

10 A. Yes.

11 Q. And I want to skip down to number 5. This  
12 is about the med student, Will Crews; is that correct?

13 A. Yes.

14 Q. And in this note that you turned in, you  
15 don't mention anything about the female med student  
16 that was talked about earlier; is that correct?

17 A. Right.

18 Q. And to your knowledge, was it a claim that  
19 he was harassing her or that she just felt  
20 uncomfortable around him?

21 A. I believe it was more that she felt  
22 uncomfortable around him. You know, I'm trying to  
23 pull back from the dregs of my memory. Like I said, I  
24 wanted to talk to her. And I feel like, if I remember  
25 correctly, I did talk to her. You know, I don't

1 remember what was said. But it was more that she felt  
2 uncomfortable. And Will told me at some point he  
3 tried to go down to the ER with both of them, and Joe  
4 told him not to. So she was uncomfortable with being  
5 around Joe by herself, I guess.

6 Q. But to be completely fair, nobody has ever  
7 made an allegation that Joe Papin said anything to  
8 this female med student that sexually harassed her or  
9 untoward in any way, to your knowledge?

10 A. Correct.

11 Q. It was just her belief she was uncomfortable  
12 around him but not that Joe had said anything  
13 harassing to her?

14 A. Correct. I don't recall any of that, no  
15 inappropriate touching or anything like that, no.

16 Q. Now, at the top -- I know I'm jumping  
17 around -- but you make the comment that you felt like  
18 you were having to give him feedback or talk to him  
19 every day.

20 A. Yes.

21 Q. And that you had noticed several things by  
22 the end of the first week that you felt like he should  
23 work on. And he actually thanked you for that input  
24 and said he hadn't received any feedback.

25 A. Okay, yeah, I see that.

1 Q. Is that your memory of what happened?

2 A. If that's what it says, yes. I try to be  
3 very good about giving feedback sooner rather than  
4 later because what's the point in giving it at the  
5 very end when they can't work on it?

6 Q. But then you go into you had to pull him  
7 aside several more times just to meet with him even  
8 during rounds with the attending. What are you  
9 referring to there?

10 A. I don't remember specific instances. But it  
11 sounded like he did something at some point during our  
12 rounds with the attending where I felt the need to  
13 pull him aside away from rounds to address a certain  
14 behavior. And I mean I don't remember certain  
15 examples, but I just remember being very frustrated.

16 Q. All right. Now, when you were under  
17 questions by counsel opposite, he showed you a lot of  
18 Joe Papin's notes for looking at the decubitus ulcer  
19 patient from December 12th through, I believe,  
20 December 22nd. Do you recall those?

21 A. Yes.

22 Q. And anywhere in those notes that he showed  
23 you was there a note from Dr. Papin that he actually  
24 did a physical examination and noted his physical  
25 examination in the record?

1           A.       No, I did not see the sacral wound mentioned  
2 in his physical exam. It seemed to be the same  
3 physical exam every day.

4           Q.       But there was nothing noted about the wound,  
5 its size, its shape, what he did, how he felt on it,  
6 what it looked like?

7           A.       No.

8           Q.       And going back to that point, so wound care  
9 came in on December the 9th. That next Monday would  
10 have been the 12th. And that was Papin's first note?

11          A.       Uh-huh, yes.

12          Q.       And according to your testimony earlier, he  
13 told you there was nothing on the backside?

14          A.       That being a Monday, I would have asked, and  
15 he said no.

16          Q.       And he was tasked with that responsibility  
17 of checking the backside?

18          A.       Yes, correct.

19          Q.       And as an intern, it's his job to go in and  
20 read the notes and the consults that are in the  
21 record?

22          A.       Correct.

23          Q.       And it's his job to let you know what's in  
24 the notes and consults that are in the record?

25          A.       Correct, more so than anybody else.

1 Q. And that's the way the team works?

2 A. Right.

3 Q. Did he ever bring up with you between  
4 December 12th and December 21st that this patient had  
5 a wound consult?

6 A. No.

7 Q. Did he bring up with you between December  
8 12th and December 21st that this person had a wound on  
9 their back?

10 A. No.

11 Q. And in fact, there would have been two  
12 separate Mondays where he would have been tasked with  
13 specifically going and checking the backside of this  
14 patient for a wound?

15 A. Yes. And being asked about it.

16 Q. And then on December 22nd, as he was  
17 basically leaving town to go to the airport, he wrote  
18 you a text; is that correct?

19 A. Correct.

20 Q. Saying the guy had an early wound?

21 A. Correct.

22 Q. I think he actually said [REDACTED] in the  
23 text; is that correct?

24 A. I believe so, yes.

25 Q. And that was the very first time he let you

1 know about the sacral decubitus ulcer?

2 A. Yes.

3 Q. And then you saw it the next morning on  
4 rounds?

5 A. Correct.

6 Q. And he went to surgery that day for the  
7 first -- is it debridement?

8 A. Debridement, yeah.

9 Q. Debridement? And I believe he asked you  
10 about the attending physicians, Dr. Robertson,  
11 Dr. Batson, and Dr. Kutcher; is that correct? They  
12 were the attendings?

13 A. Yes.

14 Q. And it wasn't their responsibility to go in  
15 and report back to you on the backside?

16 A. No.

17 Q. That was solely the intern's  
18 responsibility?

19 A. Correct.

20 Q. And with wound care, the wound care nurse  
21 placing the note into the record, it was Dr. Papin's  
22 responsibility to read the note and inform you of it?

23 A. Correct

24 MR. WHITFIELD: I believe that's it.

25 MR. MORGAN: I have some followup.



1 MR. WHITFIELD: I thought you might.

2 EXAMINATION

3 BY MR. MORGAN:

4 Q. Dr. Mahoney, so if an intern doesn't say  
5 anything to a senior resident or attending physician,  
6 you're just never going to check a patient's records  
7 ever?

8 A. If they say -- if they don't say something  
9 to me and then I walk in and look at the patient and  
10 it's not congruent with what they've told me, then I  
11 will go and look in the patient's chart, you know.  
12 But to me, in this circumstance, I had asked him  
13 pointblank: Does this patient have a wound? And he  
14 said: No. So I had no reason to feel that I needed  
15 to go look at the patient's backside or look in the  
16 patient's chart.

17 Q. So you're telling me at the University of  
18 Mississippi Medical Center, unless a first-year intern  
19 tells you or an attending something, you're not going  
20 to look at the chart?

21 A. I do look at the chart for various reasons.  
22 I do look at charts, yes, I look at charts.

23 Q. You're not looking at all the notes?

24 A. Not necessarily, no.

25 Q. Who is more responsible for a patient's

1 care, a first-year intern or a senior resident?

2 A. I feel that we are all responsible for their  
3 care.

4 Q. Who does the buck stop with?

5 A. I would say the buck would stop with --  
6 legally the buck stops with the attending, I guess.  
7 To me we're all responsible and we all play a role in  
8 the care of the patient because there's so many  
9 patients. If I had to do it personally, something  
10 could be missed. So we break it up with the interns  
11 at that level. It's like the Swiss cheese effect. It  
12 starts with them, they report things to us or don't  
13 report things to us, then it goes through different  
14 levels.

15 Q. But you agree that ultimately the attending  
16 physician is responsible for care of patients?

17 A. Yes. I mean we all are, yes.

18 Q. When you were asked about the female medical  
19 student who felt uncomfortable, Mr. Whitfield was very  
20 clear to point out it was not an allegation of  
21 harassment; correct?

22 A. Correct.

23 Q. But certainly when you hear the words that a  
24 male makes a female uncomfortable, do you not take  
25 that to mean some sort of sexual sort of issue? Or do

1 you take it a different way?

2 A. I think you can make the assumption. But,  
3 you know, that wouldn't be appropriate to assume.

4 Q. So even if a male was making a female  
5 uncomfortable and you knew it, don't you agree that  
6 would still be a reportable issue to HR?

7 A. Not necessarily HR.

8 Q. But here you didn't --

9 A. I feel like if he had -- if he had, you  
10 know, sent her a sexual text or touched her  
11 inappropriately, that's something that needs to go to  
12 HR. You know, if somebody says they feel  
13 uncomfortable, I don't know that that would  
14 necessarily need to go to HR.

15 Q. Well, you felt the need to testify in front  
16 of a group of doctors about this; correct?

17 A. I don't recall testifying about the  
18 harassment or uncomfortable.

19 Q. You didn't mention in the hearing that there  
20 was a med student who had come to you discussing she  
21 was uncomfortable?

22 A. I would have to look at the records. I  
23 don't remember making those -- I could have.

24 Q. Is there a code blue team?

25 A. A code blue team?

1 Q. Uh-huh (positive response).

2 A. Yes.

3 Q. What's the code blue team?

4 A. A code blue team is a medicine team that  
5 responds to codes.

6 Q. When you say "medicine team," who  
7 encompasses that team?

8 A. Whoever is the on-call medicine team of  
9 medical doctors.

10 Q. How many are on there?

11 A. I don't know.

12 Q. Ballpark. Are we talking one, five, in  
13 between?

14 A. More than one, probably less than five.  
15 It's whoever the medicine -- the actual medicine team  
16 in the hospital, they're called the code team if  
17 they're on call.

18 Q. So during this code that we were discussing  
19 earlier that happened, the code blue team would have  
20 responded, too; right?

21 A. They should have, yes.

22 Q. Now, when Mr. Whitfield started the  
23 cross-examination of you, he asked you about, hey,  
24 this was over three years ago at this point; right?  
25 All these issues. Is that fair to say?

1 A. Yes.

2 Q. But it's also fair to say you're not  
3 intentionally lying today, are you?

4 A. No.

5 Q. You're trying to tell the truth as best you  
6 can remember it; right?

7 A. The best I can remember, yes.

8 Q. So you may not be able to remember  
9 everything, but what you've testified to is true and  
10 accurate of what you can remember?

11 A. As far as I know, yes.

12 MR. MORGAN: No more questions.

13 MR. WHITFIELD: All right. Off the record?

14 MR. MORGAN: Off the record.

15 (A DISCUSSION WAS HELD OFF THE RECORD.)

16 COURT REPORTER: I have a question.

17 Mr. Whitfield, do you want a copy of this deposition?

18 MR. WHITFIELD: Yes. And we would like to  
19 read and sign.

20 COURT REPORTER: Okay.

21 (THE DEPOSITION OF MEAGAN MAHONEY, MD,  
22 WAS CONCLUDED AT 5:43 P.M.)

23

24

25

## C E R T I F I C A T E

I do hereby certify that the foregoing proceedings were taken down by me and transcribed using computer-aided transcription and that the foregoing is a true and correct transcript of said proceedings.

I further certify that I am neither of counsel nor of kin to any of the parties, nor am I in anywise interested in the result of said cause.

I further certify that I have earned the certifications awarded by the National Court Reporters Association of RPR,RMR,RDR,CRR,CRC,RSA.

---

DEBRA AMOS ISBELL, CCR,RDR,CRR  
NCRA (expires 12/31/2021)  
Registered Professional Reporter  
Registered Merit Reporter  
Registered Diplomate Reporter  
Certified Realtime Reporter  
Certified Realtime Captioner  
Realtime Systems Administrator

## 1 CERTIFICATE OF WITNESS

2  
3 PAPIN vs. UMMC, et al. 3:17-CV-763-CWR-FKB4  
5 I, MEAGAN MAHONEY, MD, do hereby certify that  
6 on this \_\_\_\_\_ day of \_\_\_\_\_ 2020 I have  
7 read the foregoing transcript and to the best of my  
8 knowledge it constitutes a true and accurate  
9 transcript of my testimony taken on oral examination  
10 on November 18, 2020.  
11  
12  
13  
14  
1516 \_\_\_\_\_  
MEAGAN MAHONEY, MD17  
18 DATE: \_\_\_\_\_  
19  
2021 \_\_\_\_\_  
WITNESS TO SIGNATURE  
22  
23  
24  
25

159

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



November 18, 2020

1

<p><b>1</b></p> <p>1 16:2 21:19, 20 27:6 28:13,15 41:9 46:16 49:18 53:15 140:18 <b>1,200</b> 49:25 <b>10</b> 79:11 95:7 138:7 <b>10th</b> 22:1,17 27:5 117:11 122:18 130:6 140:19,25 145:9 <b>11</b> 80:22 <b>12</b> 15:18 82:21 <b>12-hour</b> 19:24 <b>12/20</b> 86:15 <b>12/21</b> 87:2 <b>12/22</b> 87:6 <b>12th</b> 43:13 74:5 114:5 138:7 148:19 149:10 150:4, 8 <b>13</b> 84:20 <b>13th</b> 75:17 76:3 <b>14</b> 86:4 <b>14th</b> 79:8 94:4 <b>15</b> 37:5 86:22 <b>15th</b> 66:14 80:13,15 114:10 <b>16</b> 16:22 87:4 <b>17</b> 15:13 87:24 145:9 <b>17th</b> 82:18,19 <b>18</b> 88:23 <b>18th</b> 39:7 84:8 <b>19</b> 98:21</p>	<p><b>19th</b> 86:1 <b>1st</b> 11:14</p> <p><b>2</b></p> <p><b>2</b> 28:13 29:16,17 41:11,12 46:17 141:15 143:16 <b>20</b> 8:21 101:5 139:22 <b>200-</b> 61:11 <b>2003</b> 10:19 <b>2007</b> 10:21 <b>2008</b> 11:9 <b>2012</b> 10:24 <b>2015</b> 11:1 <b>2016</b> 11:1,25 15:13 16:9 19:6,20 30:13 34:11 66:15 69:3 74:5 76:3 86:1 87:19 114:10 <b>2016-2017</b> 11:25 <b>2017</b> 6:1 9:12 15:19 22:1 27:13 39:7 141:2,8,9 <b>2018</b> 11:3,9, 14 128:13 <b>2020</b> 141:4 <b>20th</b> 86:11 <b>21</b> 105:14 <b>21st</b> 87:1 150:4,8 <b>22nd</b> 87:19 88:20 95:16, 17 97:7 103:19 108:21 110:16 148:20 150:16 <b>23ish</b> 124:12 <b>23rd</b> 101:1 102:9,10,19</p>	<p>103:21,23 105:7 107:7 109:10 117:4 118:10 130:19 <b>24</b> 92:8</p> <p><b>3</b></p> <p><b>3</b> 35:21,25 44:18,20,21, 23 45:2 48:9, 12,15,19 49:19 53:21 56:21 139:22 142:13,15,18 143:11 145:3 <b>30</b> 142:12 <b>300-pound</b> 61:11 <b>316</b> 48:24 <b>32</b> 45:1 48:12 56:23 <b>33</b> 45:1 48:12 <b>3:00</b> 53:8 <b>3:11</b> 53:9 <b>3N</b> 44:18</p> <p><b>4</b></p> <p><b>4</b> 37:4,7 53:15 <b>4:10</b> 97:4 <b>4:20</b> 97:5</p> <p><b>5</b></p> <p><b>5</b> 20:2 30:2,9 42:21 57:7 92:1 146:11 <b>50</b> 39:10 <b>56</b> 120:23 <b>5:02</b> 128:5 <b>5:07</b> 128:6 <b>5:43</b> 156:22</p>	<p><b>6</b></p> <p><b>6</b> 36:4 66:20 <b>662-386-1027</b> 29:5 <b>6:49</b> 42:18 <b>6th</b> 40:15</p> <p><b>7</b></p> <p><b>7</b> 19:23 20:2, 4 69:7 <b>7:51</b> 88:8,11, 12 <b>7:55</b> 88:9</p> <p><b>8</b></p> <p><b>8</b> 74:2 <b>8th</b> 69:20</p> <p><b>9</b></p> <p><b>9</b> 75:19 <b>9:07</b> 101:20 <b>9th</b> 69:3 71:8,20 114:1,4,25 117:8,24 149:9</p> <p><b>A</b></p> <p><b>a.m.</b> 19:23 20:2,4 88:8 <b>AAO3</b> 77:7 <b>Aaron</b> 45:9,10 <b>ability</b> 8:1 <b>able</b> 28:10 33:24 38:24 70:1,11 91:2 93:14 105:4 110:12 156:8 <b>abnormal</b> 77:21 87:16</p>
---	--	---	---

November 18, 2020

2

<b>about</b> 5:17 7:2,17 8:5, 19,20 9:16,25 11:13 13:8 14:20 17:4,22 18:1 22:5,6, 13,25 23:4, 13,16,17,25 24:2,6 25:5 26:12 28:2 29:12 31:7 32:1,15 33:3, 5,7,25 34:16 37:14 38:8 39:8,19,20,21 40:6,14 41:10,11,14, 20 42:9 43:3, 10,16 44:3, 12,24 45:4, 21,22 46:3, 14,18,21,23 47:15,24 49:19 50:6 52:10,13,21, 25 53:1,16, 19,23 54:11, 13 55:1 56:9, 19 57:7 58:7 60:25 61:1 63:23 64:2 77:12 78:25 81:9 84:23 85:18 89:3,13 93:20 95:7 96:6,8 99:18, 24 100:3 101:12 102:4 103:8 107:21 108:3,9 109:5,19 110:10,25 111:18 112:1 113:10,12 116:6 117:3, 16 118:4 119:8,12,14, 17 120:24,25 121:12,20	122:4 123:12, 17,22 124:23, 25 125:25 127:11,14,19 128:1,10,22 129:7,8,10, 18,19,20 130:2,4,18,24 132:9,12,22 133:9 136:24 137:3,6,7,15, 25 138:23,24 139:25 141:16,21 142:5 144:1, 10 145:25 146:12,15,16 148:3 149:4 150:15 151:1, 10 153:18 154:16,17 155:23 <b>above-and- beyond</b> 146:7 <b>abrasions</b> 25:13 <b>according</b> 149:12 <b>accurate</b> 12:2 42:25 62:18 76:11 113:22, 23 121:13 141:14 156:10 <b>accusation</b> 47:18,21 59:15 <b>action</b> 109:11 112:13 <b>actions</b> 132:18 <b>actively</b> 89:12 <b>actual</b> 14:17 27:16 35:1 66:25 92:1 155:15 <b>actually</b> 37:25 40:14	60:21,22 80:9 81:7 88:4 93:2 100:17 102:4 114:22 135:23 137:16 138:15 146:5 147:23 148:23 150:22 <b>acute</b> 15:1 83:3 90:18,20 <b>acutely</b> 78:24 <b>adamant</b> 137:5 <b>add</b> 38:15 <b>address</b> 24:1 54:23 148:13 <b>addressed</b> 56:14 83:24 <b>addressing</b> 83:20 <b>adjourn</b> 53:5 <b>admission</b> 16:6 <b>admitted</b> 89:25 121:16 <b>admitting</b> 90:1,5 <b>advance</b> 7:22 <b>advanced</b> 117:19 <b>adverse</b> 119:23 <b>affect</b> 8:1 <b>affected</b> 137:13 <b>affirming</b> 75:10 <b>after</b> 10:24 22:5,14 27:5 31:23 42:19 43:2 45:14,24 49:5 57:6 75:8 98:8,10 109:13 114:2 117:3 124:12 139:18 146:8 <b>afternoon</b> 17:11 18:9,19	46:13 99:21 100:4 143:20 144:4,13 <b>afterward</b> 116:20 <b>afterwards</b> 26:15 <b>again</b> 17:13 18:9 43:10 53:15 60:9 75:16 79:9 80:15 84:8 86:1,12,19 87:19,20 89:6 92:12 95:20 97:8 122:2 133:11 140:7 145:25 <b>against</b> 5:20 122:19 123:19 <b>agenda</b> 131:4 <b>ago</b> 5:18 8:2 73:4 81:16 84:16 90:9 103:10 115:5 124:24 141:5 155:24 <b>agree</b> 31:6 47:18 71:20 74:17 76:4 80:18,25 84:12 86:17 97:9 110:17 114:16 125:3, 10,14 153:15 154:5 <b>agreed</b> 74:22 121:16 <b>agreeing</b> 94:22 <b>agrees</b> 83:9 <b>ahead</b> 19:2 65:5 96:18 <b>airport</b> 150:17 <b>alarm</b> 97:21 100:13,15 102:1 111:17
--	--	--	--

November 18, 2020

3

<b>alerted</b> 64:5 115:17,21	111:8 121:24 123:9 125:20 156:2	43:20 44:3,4, 6,8 45:3,6,20 46:3,10,11, 12,13,14	88:7,8,11,20 89:1,16 90:2, 19,22,24
<b>alerting</b> 111:12 112:8	<b>always</b> 6:11, 17 7:1 35:13	47:4,24 48:8, 14,15,20,24, 25 49:4,9	91:1,3,4,5, 21,25 92:5,8, 10 93:7 94:6, 11,20 95:16, 20 96:6,18
<b>alias</b> 93:6	61:12 65:23 94:19 139:23	50:4,12,17, 22,24 51:7, 15,16 52:1,2, 5,10,11 53:22	10 93:7 94:6, 11,20 95:16, 20 96:6,18
<b>all</b> 6:10 7:11 9:14 17:2 20:8,10,11 22:10 26:12 28:1 30:9 38:20 41:8 46:11 51:24 56:2 68:15 73:10,19 76:25 82:13 90:2 106:16, 25 120:15 126:23 127:7 128:4 131:20 134:22 135:24 140:11,12 148:16 152:23 153:2,7,17 155:25 156:13	<b>am</b> 34:17 66:1 <b>amongst</b> 21:2 <b>anatomy</b> 70:10 <b>and</b> 5:3,6,13 6:15,21,25 7:1,16 8:15, 19 9:7,11,16 10:12,16,20, 22 11:1,2,3, 9,11,15,17 12:1,10,25 13:2,6,15 14:1,10,15,25 15:2,3 16:5, 10,17 17:2,4, 6,9,11,16,22, 24 18:5,9 19:5,14,24 20:2,6,8,12, 14,15,16,17, 19,21,25 21:1,3,4,6,25 22:8,11,18,22 23:7,12,21,22 24:1,2,4,18 25:2,4,10 26:2,8,19 27:2,4,11,25 28:2,8,22,24 29:7,12,21,23 31:7 32:8,10, 23 33:4,7,10, 12,13,21,23, 25 34:2 36:3, 4,5,9,15,20, 21 37:5,10, 13,16,17 38:12,18 39:10 40:5,6, 9,21 41:10, 14,22,24 42:1,3,24	54:6,23 55:4, 7,11,18 56:14 57:7,8,16,20 58:6,12,13, 22,23 59:7, 19,25 60:2, 14,23 61:10, 13,17,19,20 62:21 63:4, 20,24 64:7, 14,15,21,25 65:5,8,9,15, 21,22 66:9,15 67:3,7 68:3, 4,8,11,12,13, 14,21 69:18, 23 70:4,10, 18,20,22 71:4,5,11,12, 16 72:2,5,7, 11,12,18,24 73:5,7,14,15, 17,20 74:16, 22 75:5,11,22 76:1,3,4,13, 20,22 77:4, 11,17 78:1,9, 10,14,24,25 79:9,15,17, 21,23,25 80:6,18 81:18,19,21 82:1,3,10,15, 17 83:7,8,9, 13,17,25 84:1,16 85:13,25 86:7 87:19,21	20 96:6,18 97:10 98:5, 12,15,16 99:3,4,9,14, 18,19,20 100:12,17 101:8,9,16,18 102:8,15,23 103:1,2,3,4, 8,18,20 104:6,7,14 105:4,17,22 106:2,5,10, 14,19 107:8, 11,14,16,17 108:4,7 109:13,14,18 110:4,7,11, 12,14 112:4, 11,12 114:3, 6,7,8 115:3, 10,17,18 116:9,14 117:7,9,10, 19,20,21,23 118:2,6,10, 22,24 119:2, 6,13,20,21,24 120:8,12,15, 16,19,24 121:8,16 122:3,21 123:11,13 124:3,22 125:6,10,25 126:6,22,23 127:1,8,16 128:2,16,22, 25 129:2,13, 19,22,25 130:1,6,18, 19,21 131:10,
<b>allegation</b> 58:7 125:11, 15 127:4 147:7 153:20			
<b>allegations</b> 32:11 123:19 125:3,6			
<b>alleging</b> 5:21			
<b>allowed</b> 36:9			
<b>almost</b> 31:13 42:16 73:5 82:6			
<b>along</b> 124:6			
<b>already</b> 62:15 105:3 144:20			
<b>also</b> 13:4,7 17:16 21:5,6 24:8 45:6,10 56:22 58:11 68:17 74:7 77:12 79:15 83:8 85:2 86:1 88:19 105:25 110:20			

November 18, 2020

4

12,13,22,24 132:11,12 133:5,13,14, 15,24 134:5, 12,13,20,21, 24 135:2,9, 15,19 136:25 137:10,15,18, 19,22,25 138:3,5,6,11, 13,16,18,23 139:1,22 141:15 142:7, 8,13,22 143:3,10,11, 15 144:9,22 145:3,5,8,10, 16 146:1,5, 11,14,18,24 147:2,3,21, 23,24 148:14, 22,24 149:8, 10,12,14,16, 19,20,23,24 150:1,4,8,11, 13,15,16,25 151:3,6,9,11, 14,15,20,22 152:9,11,13 153:7 154:5 156:9,18,19 <b>angry</b> 107:11 <b>another</b> 15:2 38:23 41:23 44:9 54:12 69:18 77:25 83:3 84:24 85:2 95:17 99:18 105:17 106:13 111:15 126:22 <b>answer</b> 6:22 7:3,7 19:3,4 32:25 33:15 40:9 45:18 98:4 112:19 118:8 125:18 137:18 140:8	<b>antibiotics</b> 91:4,6,10 92:2 <b>any</b> 6:7 7:16, 25 8:6 9:1,10 10:4 13:13 15:15,21 17:6,14,16 23:4 24:5 25:3 26:8 28:17 29:1 31:13 32:6 34:18 36:23 38:2 44:12 48:5,11 51:12 54:8 56:8,11, 23 57:1,2 59:8 61:18 64:7 65:12 68:4,10,24,25 71:11 78:19 84:4 91:2 96:4 97:25 98:1 107:9 109:21 112:14,15 114:19 115:11,16 116:16 117:1, 8 120:6 122:19,24 126:2 127:13, 18,19 129:6, 13,22,23 130:11 132:22 134:7 136:1,2 140:4,5 143:9 144:11 145:14 147:9,14,24 <b>anybody</b> 14:3 32:15 35:5 36:24 41:4 48:3,24 85:14 104:17 109:20,22 117:2 127:3 129:10 130:10,17,23 146:3 149:25	<b>anything</b> 5:24,25 6:12 8:1 9:13 16:2 17:6 20:24 22:25 25:11 26:12 27:12 28:6 40:22 41:3,4 42:4 47:17 50:18, 25 51:4 54:11,12 59:9 60:11 63:23 64:5,24 73:15,17 92:7 96:4 104:9 107:10 118:14 121:1 122:19, 25 123:17 126:15 127:21,22 129:14 130:12 135:23 139:24 145:17 146:15 147:7,12,15 152:5 <b>anyway</b> 108:17 <b>anywhere</b> 24:14 126:8 148:22 <b>apologize</b> 7:22 119:6 <b>apparently</b> 36:11,12 142:20 146:2 <b>appeal</b> 27:17 39:6 <b>appeals</b> 6:3 27:13 38:11 128:20 139:18 <b>applying</b> 65:13 <b>appropriate</b> 37:19 154:3 <b>appropriately</b> 92:3 119:1 <b>approximately</b> 11:22 13:5	<b>are</b> 7:25 9:17,25 10:8 11:12 13:21 14:1,6,17,20, 22 15:10 17:6,20 19:20 20:1 31:13 32:21,22 39:22 44:6, 11,22,23,24 48:6,12 53:11,19 55:12 56:19, 20 57:23 58:11,14,15 59:1 61:24 63:1 65:17 67:22,25 71:6 73:1,10,18 75:15 78:15 82:14 89:12 90:24 91:2 92:4 103:13 110:11,19 116:6,12 120:15 125:4, 6 135:10,19 139:5 143:12 144:1,11 146:1 148:8 149:20,24 153:2,17 155:10,12 156:3 <b>area</b> 61:13 <b>around</b> 34:1 42:16 53:2 64:3 73:18 123:23 131:9 146:20,22 147:5,12,17 <b>arrogance</b> 30:17 <b>arrogant</b> 31:7 <b>as</b> 5:6 9:16 13:12 14:16 21:19 25:1 27:14 29:16 33:3 34:3
---	--	--	--

November 18, 2020

5

35:20 36:6, 21,22 37:3 47:25 48:17 51:23 52:16 55:9 58:12 64:4 65:25 67:20,22 69:14 70:21 72:9,11 73:16 76:5 77:22 78:17 80:18 81:3,13 84:4 85:11 86:8 87:21 90:1 92:1,2 93:5 94:9 95:20 96:25 97:1 105:6 107:16 109:6,25 113:1,19 114:9 115:14 118:14 124:11 132:21 133:2, 3 134:11 135:2 136:3, 13,23 141:11, 23 142:25 143:10,17,18, 25 144:14 145:12 149:19 150:16 156:5, 11 <b>ascertain</b> 97:15 <b>Ashley</b> 43:18, 20,21 45:19 129:16,19 <b>aside</b> 148:7, 13 <b>ask</b> 6:21 7:1, 9,11,14,21 8:4 12:21 41:4 46:13 48:20 51:2 64:6 89:18,19 103:9,16 108:24 110:13 116:5 127:3 129:19	136:17,19 139:23 143:9 <b>asked</b> 24:1,2 34:16 35:17, 18 40:2,5 41:24 51:8 98:3 110:10 114:5 116:2 117:20 119:6 120:25 129:4 137:22 138:16 143:22 145:11,22 149:14 150:15 151:9 152:12 153:18 155:23 <b>asking</b> 6:23 36:5,24 41:23 101:2,23,24 102:20 109:2 116:7 127:6 <b>assert</b> 30:15 <b>assess</b> 61:9 64:5 65:10 <b>assessed</b> 70:4 <b>assessment</b> 63:14 65:21 66:9 95:17 104:14 <b>assign</b> 64:13 81:11 110:22 <b>assigned</b> 20:23 85:22 <b>assignments</b> 15:21 <b>assume</b> 8:8 15:4,16 88:18 89:21 118:16 154:3 <b>assuming</b> 44:4,11 <b>assumption</b> 30:11 143:13 154:2 <b>at</b> 6:17 7:11, 16 9:5,11,18 10:22 11:4,7 12:1 14:23	17:11 20:21 23:23 24:12, 15 25:2 26:3, 8,12 27:19 30:8,9,25 31:25 32:24 34:18 36:24 37:25 38:3,6, 7 39:16 41:10 42:18 43:3,5 44:13,22 48:12,18 49:13 51:14 52:18 53:22 54:4,5 55:17 57:20 58:14, 22 59:2,21 61:13,15,18, 19 62:12 63:13,16 65:23 70:24 71:4,5,6,8,23 72:8 73:9,10, 22,24 76:21 81:1,5 82:2 88:10 90:9 91:14 92:11, 22 93:9 96:6, 8,22 97:2,24 98:7 99:11, 12,16 100:11, 12,13,16,21 101:15,19,20 102:2 103:3,7 105:3,4 106:8,15,16, 24 109:7,15 111:21 112:10,12 113:13,20 114:2,23 115:14 116:12 117:2,5,12,23 118:11 120:1, 6,20 122:17, 23 124:14,15 127:24 128:20 129:17,22,25 131:10,20	133:1 134:2,4 136:4,11 137:16,18,19 138:1,18 139:9 141:19 143:9 144:22 145:4 146:2 147:2,16 148:4,11,18 152:9,15,17, 20,21,22,23 153:11 154:22 155:24 156:22 <b>attach</b> 79:7 114:9 <b>attached</b> 105:6 <b>attaching</b> 84:7 <b>attend</b> 20:6 39:12 <b>attending</b> 14:20,25 17:7 20:16 26:17 58:13 67:2 68:17,20 71:13 72:15, 19 73:21 74:7,16 75:7 76:21 83:4,5 86:9,19 90:2, 5 104:25 105:1,5 112:15 115:11,19,20 119:11 133:2 148:8,12 151:10 152:5, 19 153:6,15 <b>attending's</b> 77:9 <b>attendings</b> 14:23,24 20:8 72:23 73:21 81:9,13 120:15 151:12 <b>attention</b> 76:22 97:19 110:21 111:9
---	--	--	--

November 18, 2020

6

<b>attest</b> 81:10 94:16	144:23 145:2, 3 146:23	<b>basis</b> 60:7	137:1 138:2, 12,17 142:6
<b>attestation</b> 79:21,23 81:23 82:3 84:1	149:8 150:9 151:15	<b>bathe</b> 89:9	143:5,6,7
<b>attestations</b> 75:6 83:12,15 87:12 89:20	<b>back-to-back</b> 69:13	<b>bathing</b> 65:4	144:4 145:1 148:4 153:8
<b>attested</b> 87:6	<b>background</b> 10:15 62:19 75:1,2,3	<b>Batson</b> 82:24, 25 83:2,17 84:4,9 86:1, 12 87:1,20 106:14 113:10 151:11	<b>becoming</b> 54:24
<b>attitude</b> 28:23 143:22	<b>backs</b> 62:22	<b>bay</b> 33:23	<b>bed</b> 23:20 62:23 67:23
<b>authority</b> 18:22 50:14	<b>backside</b> 24:13,22 25:3 61:2,5,15 62:2 63:11 65:5 76:17 103:17 109:8 112:11,24 113:14,20 116:15 149:13,17 150:13 151:15 152:15	<b>beating</b> 37:23	<b>beds</b> 44:24 48:12
<b>available</b> 38:19 44:24	<b>backsides</b> 23:24 24:20 62:8	<b>became</b> 27:10	<b>been</b> 7:22 9:24 10:2,13 18:6 19:16 22:14,20 24:3 25:12 29:3 30:5,10,19 31:2,5 32:1 33:2,9 34:13, 21,23,25 37:15 38:17 42:3 43:7,8, 25 44:7,8,16 46:2 50:4 52:6,10,12,25 54:19 56:24 57:5 58:1,4 64:5 66:7 67:3 69:4,5, 15,24 71:9,19 72:6 75:7,9 76:15 77:2 82:7 86:7 89:13,25 91:10,12,14, 15,16 96:8,10 99:8 100:6 102:11 104:19,24 105:2 106:16, 18 107:13 108:13,14 109:5,7,22 110:4,12 111:13 113:2 116:11,19,21 119:15 120:4 121:25 123:20 124:14,24
<b>away</b> 55:16 66:5 102:8 119:5 148:13	<b>bacteria</b> 91:3,25 92:1	<b>because</b> 15:17 20:4 22:16 23:12 24:24 25:7 26:15,16 27:1,3 28:6, 8,19 32:24 33:18 38:16 39:1 40:14 47:8 50:13 51:6 54:15 55:8,12 61:11 62:4 63:22 65:25 70:11 72:1 73:21 75:4,10,16 81:9,10 87:11 89:12 90:5 92:23 93:9 94:14 99:6 100:4,10 102:5,15 103:2,13 104:19 105:2, 20,25 108:7 112:9,23 113:1,6,7,19, 25 114:2 116:22 118:16,25 121:14,17 122:9 124:16 126:5 128:14 129:17 130:2 132:11 133:22,23 134:3,14 136:6,13,25	
<b>B</b>	<b>bad</b> 23:22 50:6 55:20 56:4 111:16 119:1		
<b>B-R-U-C-H</b> 85:3,8	<b>bag</b> 119:4		
<b>back</b> 11:2,24 15:10 23:22 24:5 30:12 31:3,25 40:20 41:9 42:12 46:16 47:10 49:10,18 53:13 61:13, 18,19,20 62:12 69:15 81:5,15 90:8 94:3,25 95:15,16 96:25 97:7 99:4 100:18 101:2,8 108:7 114:1,8 119:16 120:22 128:16 129:13,22,25 130:6 131:10, 22 138:3 141:7,10,11, 15 142:18	<b>BAL</b> 90:23		
	<b>ballpark</b> 5:16 8:17 11:8 48:12 155:12		
	<b>base</b> 94:11		
	<b>based</b> 15:13 30:12 31:1 38:4 64:13 94:13 107:14 113:8 114:1 118:15		
	<b>basic</b> 12:17 13:3 92:10		
	<b>basically</b> 74:10 144:19 150:17		



November 18, 2020

7

126:1,24	136:10,23	155:13	<b>bring</b> 97:19
129:21 131:10	143:10,11	<b>big</b> 43:3	111:9 132:19
136:5,7,20	147:4 148:15	44:23 120:17	150:3,7
137:1,10	149:14 150:15	<b>biggest</b> 22:7	<b>Brooks</b> 19:10
138:6 139:18,	<b>belief</b> 126:11	54:22 130:3	<b>brought</b> 5:20
20,22 146:4	147:11	<b>biochemistry</b>	52:15 76:21
149:10	<b>believe</b> 8:24	10:20	<b>Brown</b> 105:8,
150:11,12	9:14 11:24	<b>biology</b> 10:21	11
<b>before</b> 5:23	20:21 23:7,12	<b>bit</b> 18:1	<b>Bruch</b> 45:3
17:12 22:18	26:25 44:18	46:10 50:13	84:24 85:3,4,
26:17 34:11	55:3 56:13	69:23 75:16,	23 127:9
40:15,20	57:13,20	23 77:1	144:4
41:3,5 51:17,	60:3,22 62:16	80:14,16,25	<b>buck</b> 153:4,5,
18 56:13 57:9	85:4 92:14,24	86:12 131:9	6
58:10 63:17	94:23 106:5	<b>black</b> 97:16	<b>building</b>
64:3 67:4	120:3 122:21	118:15	143:3
87:11 102:6	123:5 128:13,	<b>blame</b> 112:6,7	<b>busy</b> 143:6,7
108:20 124:12	21 129:16	<b>blamed</b> 112:8	<b>but</b> 6:2,11,
127:11 129:24	130:13,20	<b>blank</b> 27:16	15,18,23 7:2,
132:10 137:4	132:5,13	140:21	4,18 8:7
139:19,21	146:21 148:19	<b>blaringly</b>	10:14 12:17
<b>beforehand</b>	150:24 151:9,	83:25	15:18,20
129:7	24	<b>blood</b> 90:25	16:23 18:4
<b>beginning</b>	<b>bells</b> 97:21	92:7	19:9,22 20:18
6:18 22:15	100:13,15	<b>blue</b> 48:8	22:21 23:8
24:15 25:20,	102:1	154:24,25	24:17 25:6
21 27:24	<b>bells-type</b>	155:3,4,19	26:3 27:15,16
112:10 115:15	111:17	<b>bony</b> 67:22	28:1,14 29:22
117:12 122:18	<b>below</b> 13:4	<b>book</b> 63:4	30:12,14,23
145:4	19:2 84:2	<b>boss</b> 133:4	31:20,24 32:2
<b>behavior</b>	97:16	<b>both</b> 22:22	33:14 34:5,
27:20 28:2,11	<b>besides</b> 29:1	24:2 57:25	22,25 35:13
127:13 148:14	54:2,9 56:9	86:7 147:3	36:21 37:11
<b>behavioral</b>	69:16 108:19	<b>bottom</b> 68:3	38:6,22 41:2,
31:4	112:3 127:14	70:24 71:6	11,18,22
<b>behaviors</b>	130:18	73:24	43:9,18
28:14 30:6	<b>best</b> 140:8	<b>break</b> 7:16,17	45:15,22
<b>behind</b> 44:15	156:5,7	53:1 95:10	46:20 47:16
50:4 52:11,	<b>better</b> 34:5	96:19 153:10	48:4 50:6
12,14,16	42:6 55:25	<b>breaking</b>	52:12 55:5,23
<b>being</b> 12:7,13	63:14 66:8	134:1	56:4,13,22
29:1 31:7	141:7,8	<b>breath</b> 92:16	59:13 60:22
32:11 33:2	<b>between</b> 25:11	93:11	62:8,24 63:4
38:12 50:23	29:20 31:7	<b>Brewster</b> 44:7	64:17,25
54:23 72:2	36:4 37:5	<b>briefly</b> 15:24	66:16 67:13
93:14 98:1	72:2 98:15	140:12	68:22 69:14,
103:3 106:24	101:24 130:19		15 70:19
107:1,11	150:3,7		71:3,19 73:9
111:20 126:4			78:4,23 80:16

November 18, 2020

8

81:13 83:18 85:8 86:13 87:16 88:16 89:14 90:2,20 91:10,16 92:9,22 94:13,17 95:7 97:17 100:22 101:23 102:22,24 104:5 106:9, 21 107:5,20, 22 108:17,20 109:17,24 110:9,11 111:10,20,25 112:2,6,8,22 113:21 114:23 115:20 116:19,24 119:11,14,18 121:11,16,19, 21,24 123:8, 16 124:10,24 126:7,10 127:1,7,15,24 128:15 129:17 130:22 131:9, 14,17 132:4, 14,17,21 133:2,12 134:3,6 136:19 137:17,21 138:5,15 140:10,17 141:24 142:17 144:16 146:8 147:1,6,12,17 148:6,10,15 149:4 152:12 153:15,23 154:2,8 156:2,9 <b>butt</b> 61:13 <b>button</b> 82:3 <b>by</b> 5:3,9 6:10,11 12:6, 12 16:5 19:23	21:22 28:22 29:19 36:2 37:9 39:13 40:3 42:23 45:17 46:1,7 52:6 53:10 56:3,18 58:4, 16 59:7 65:1 66:22 67:14 69:9,19 72:17,18 73:6,25 74:4, 7 75:6,21 79:13 80:15, 24 82:23,24 84:8,22 86:6, 12,24 87:7 88:1,12,16,25 89:1,6 91:12 92:1 93:12 95:14,24 97:6 98:23 100:5 101:7,22 104:20 105:8, 16 106:11,22 107:25 110:5 112:18 114:10,11,15, 25 115:6 117:5 121:1 125:17 128:7 137:13 140:2, 15 147:5,21 148:17 152:3  <b>c</b>  <b>call</b> 13:5,6 15:7,12 17:23 26:1 28:11 37:19,21 48:18,23 49:9 63:20 64:15 67:22 78:1 80:3 90:20 95:9 96:20,25 110:20 119:21 142:18 144:22 155:17	<b>called</b> 17:3, 18 20:14 41:15 44:17 48:6 78:23 100:6 118:23 141:23 142:24,25 143:4,10 155:16 <b>calling</b> 13:24 142:20 <b>calls</b> 15:16 <b>came</b> 11:1,24 17:17 18:10 34:14 57:8,19 95:16 104:1,8 119:16 141:19 149:9 <b>can</b> 6:24 12:22 14:4 15:4 16:22 23:22 25:7 29:23 30:11, 15 31:21 42:5 45:18 46:9,17 47:10 48:6 54:11 55:8 62:23 63:4 64:17,18 65:6,12 66:15 79:21,23 80:6 82:15 92:7,11 97:1 108:7 111:2 112:19 123:17 125:18 126:21 133:24 139:24 140:8, 17,18,19 143:14 154:2 156:6,7,10 <b>can't</b> 15:21 19:14 21:10 24:24 27:25 28:24 31:24 48:4 56:8 61:12 81:14 83:17 97:16 104:20 110:22 111:10 112:20	115:19 118:8, 13 121:19 127:22 131:14 145:1 148:5 <b>car</b> 16:3 <b>card</b> 126:19 <b>care</b> 9:5 10:25 11:1 13:16 15:1 20:23,25 26:10 32:6 46:12 56:22 62:21 64:17, 19,20,21,22 65:1,9,11,16, 18 66:8,17 67:7,12 68:10 69:19 70:20 75:1 77:13,14 78:4,24 83:3, 4 84:16 89:2, 15,16,23 90:3,4 92:10 95:17 96:4,16 97:8 98:5,10, 13,16 100:5 106:13 109:25 110:25 111:3, 4,5,6,7,14, 19,23 112:22 113:5,6,8,16 114:2,4,10, 17,18 115:1,6 116:22 123:3 132:14 134:8 135:16 136:24 137:1 138:13 149:8 151:20 153:1,3,8,16 <b>careful</b> 6:20 <b>Carroll</b> 106:11,12,24 107:4 109:18, 19 112:4 117:9 119:9 <b>carry</b> 17:9 65:16 <b>carrying</b> 13:24
--	--	--	--



November 18, 2020

9

<b>case</b> 5:19,24 8:23 26:2	63:16,22 71:9,23 72:1, 4 73:22 79:2	<b>chronology</b> 104:1,4	23 57:16 67:4 70:16 93:7
<b>cases</b> 49:19, 22,25 50:3,7, 15 51:10,13, 17 52:5,22 131:6,17 133:15 145:4, 6,19 146:1,6, 9	91:22,23 98:12 99:3 111:11 114:3 115:10,11,20 117:6,24 118:7 127:1 152:11,16,20, 21	<b>circumstance</b> 152:12	99:19 102:15 105:21 106:5 108:2 111:14 128:19 138:3 140:22 142:17 144:12,22 154:20
<b>caught</b> 32:22 136:7	<b>charts</b> 65:19 72:23 73:18 115:7,16 120:12 152:22	<b>CIVIL</b> 5:2	<b>comes</b> 18:12 20:3 49:5 50:12
<b>Caulder</b> 101:3 108:11,14	<b>check</b> 24:20, 21 51:9 61:1, 5 62:8 71:25 72:3,23 91:21 96:23 100:9 126:15,18,21 152:6	<b>claim</b> 59:5 146:18	<b>coming</b> 19:21 54:6 73:6
<b>center</b> 16:2 29:22 39:17 96:23 152:18	<b>checked</b> 71:22,23 93:6	<b>clear</b> 153:20	<b>comment</b> 23:4 61:5 147:17
<b>certain</b> 5:20 12:4,7 24:2 25:6 27:25 30:6 76:17 108:4 148:13, 14	<b>checking</b> 59:5 149:17 150:13	<b>clearly</b> 6:25 138:12	<b>committee</b> 121:22,24 122:3,4 128:24
<b>certainly</b> 30:15 80:8 97:13 113:21 133:2 153:23	<b>cheese</b> 153:11	<b>client</b> 96:22	<b>common</b> 29:12 50:9,11 70:13
<b>chance</b> 12:17 99:5	<b>chest</b> 92:16 93:11	<b>clipboard</b> 82:8,13	<b>communicate</b> 6:21 29:12 93:15
<b>change</b> 49:5, 13 70:22 92:10 131:9 141:20 145:2	<b>chief</b> 12:2,3, 4,7,8 13:1 14:9,15,16, 17,19 16:12 18:23 21:3 38:18,24 41:23 43:18, 21,23,24 50:7 54:19 68:15 78:14,17 131:11,17 133:10,12,16, 17,20 134:7, 11,23,25	<b>clock</b> 20:2 144:16	<b>communicating</b> 138:11
<b>changed</b> 69:12 144:20	<b>chiefs</b> 134:22	<b>closest</b> 48:23	<b>communication</b> 55:24
<b>changes</b> 68:4, 10	<b>children</b> 10:4	<b>clothes</b> 144:13,20,24 145:1	<b>complained</b> 53:16
<b>changing</b> 110:1 121:18	<b>chime</b> 93:3	<b>coast</b> 19:15	<b>complaint</b> 122:19
<b>characteristic</b> <b>s</b> 27:25 28:14,18	<b>Christmas</b> 106:2	<b>cocci</b> 91:25	<b>completely</b> 34:5 108:15, 16 147:6
<b>charge</b> 19:1 21:3 59:1 131:8 133:14 135:1		<b>code</b> 41:15 44:17 48:8,15 49:7,12 79:1 141:19,23 142:24,25 143:4,11 154:24,25 155:3,4,16, 18,19	<b>Complying</b> 92:13
<b>chart</b> 25:19, 25 26:2 59:11		<b>coded</b> 37:22 47:16 78:25	<b>composed</b> 22:10
		<b>codes</b> 48:6 155:5	<b>computer</b> 73:19 82:6 89:22 126:22 134:17
		<b>coding</b> 49:3	<b>concern</b> 22:7 23:9 25:25 47:5,14 118:2 138:14
		<b>collect</b> 96:3	
		<b>colostomy</b> 119:3	
		<b>Columbus</b> 5:15 9:24 10:18 11:12,17	
		<b>come</b> 16:4,6 26:5 28:4 49:10 51:25 53:23 55:21,	

November 18, 2020

10

<b>concerns</b> 22:6 63:19 <b>CONCLUDED</b> 156:22 <b>conference</b> 39:16 119:22 120:2 133:12, 15 134:3 135:2,5,25 <b>conferences</b> 20:5,7 120:9, 14 135:20 <b>confirm</b> 102:20 <b>conflict</b> 56:10,11 <b>confrontation</b> 47:15 <b>confused</b> 92:20 116:6 122:10 134:6 <b>confusing</b> 7:10 <b>congruent</b> 152:10 <b>consider</b> 47:20 <b>considered</b> 12:2 19:1,2 <b>consisted</b> 20:13 <b>consists</b> 14:7 <b>consult</b> 13:25 65:1,5 66:17 69:19 73:14 89:5,16,23 114:17,18,20 115:16,17 150:5 <b>consulting</b> 72:24 96:5 <b>consults</b> 13:7,25 21:7 98:6 149:20, 24 <b>continuation</b> 100:25	<b>continuing</b> 13:3 98:17 <b>contributed</b> 49:15 <b>conversation</b> 8:7,18 42:2 45:20,25 57:3,17,18 58:3 117:16 123:18 125:23 127:7 129:7 142:3 <b>conversations</b> 22:23 23:1 <b>convicted</b> 7:22 <b>copied</b> 77:17 <b>copy</b> 79:25 140:16 156:17 <b>copying</b> 138:13 <b>correct</b> 8:9 15:9 16:20 23:8 25:18 27:18 29:24 33:12,13 38:11 39:25 42:19 54:4 59:12 60:13 64:25 67:6 71:9,17,18 73:20 74:8 77:16 86:2 87:22 88:4 89:3 95:18 98:1 100:6,7 101:10,11 110:2,5,6 114:12 115:7 121:9,10 122:1,6 135:8 136:15 137:20 142:22 146:12,16 147:10,14 149:18,22,25 150:18,19,21, 23 151:5,11, 19,23 153:21,	22 154:16 <b>correctly</b> 22:9 60:17 118:21 146:25 <b>cosigned</b> 82:24 <b>could</b> 5:10 10:14 12:6,18 15:24 24:1 25:12 27:22 30:19 31:5 32:2 33:3,23 34:23,25 47:2 48:11 49:15, 17 51:9,25 57:1 58:21 59:2,10,13 62:18 63:13 71:3,13 73:8 81:6,12 85:12 87:10,12 88:14 89:15, 20 90:15,16 95:2 103:23, 25 105:25 112:12,24 121:21 126:8, 13,21,25 127:2 128:15 136:7 137:14 144:7,14 153:10 154:23 <b>couldn't</b> 28:7 93:7,10 94:24 <b>counsel</b> 127:11 148:17 <b>count</b> 73:8 <b>couple</b> 9:6 88:20 120:7 145:22 <b>course</b> 31:25 109:11 112:13 <b>court</b> 6:12, 19,24 156:16, 20 <b>cover</b> 36:21 <b>covered</b> 131:6	<b>covering</b> 21:5 41:8 <b>creams</b> 65:14 <b>create</b> 79:21 80:6 82:11 <b>created</b> 28:12 <b>Crews</b> 57:14, 15,16 58:4 124:2 125:20 127:4 146:12 <b>crime</b> 7:23 <b>critical</b> 10:25 11:1 62:20,21 130:3 132:11 138:24 <b>cross</b> 53:3 <b>cross-</b> <b>examination</b> 155:23 <b>crossed</b> 138:10 <b>culture</b> 90:22,23 91:4,13 <b>cultures</b> 91:5,6,7,10, 21 92:8 <b>current</b> 135:16,18 <b>currently</b> 5:13 <b>cutting</b> 66:5
<hr/>			
<b>D</b>			
<hr/>			
<b>dad</b> 73:4 <b>daily</b> 9:6,7 16:7 33:21 78:18,23 110:1,8,19 117:6 121:18 <b>data</b> 135:18 <b>date</b> 22:21 43:4 75:15 88:2,8 130:19			

November 18, 2020

11

<b>dates</b> 18:4	103:6 118:22	<b>deemed</b> 16:5	18:22 20:9
<b>dating</b> 113:25	151:7,8,9	<b>definitely</b>	22:4,22 23:4
<b>day</b> 8:15	<b>debridements</b>	24:17	24:4,6,19,20
12:19 17:5,9,	65:13	<b>degree</b> 114:19	25:16,19,24
14,18 18:6	<b>debriefing</b>	137:12,21	26:11,18
20:1,5,19,22	124:15	<b>delay</b> 116:22	32:10,15
21:11 22:18	<b>debriefings</b>	136:25	33:16 35:4
29:8 36:13,25	57:20,21,23	<b>denied</b> 93:10	37:25 38:1,6
37:1,13,19,24	<b>December</b>	<b>deny</b> 92:15	39:12 40:18,
43:4,7 49:4	15:19 16:9,22	<b>depend</b> 67:13	20,24,25
50:18,21	19:6,20	<b>depending</b>	41:1,4 43:2
52:23 55:13	25:16,20	14:7 18:9	45:13 46:18
61:16 72:7,	34:11 36:4	<b>depends</b> 64:16	47:24 51:3
10,15 73:5	37:4 40:15	<b>deposition</b>	52:9 55:1,3,4
79:14 82:2	43:13 56:25	5:1,22 6:9	57:16 58:9
83:20,21,25	69:3,17,20	8:4,9,12,23	59:4 60:17,19
84:18 85:13,	71:8,20 74:5	9:2 156:17,21	62:6,9 72:3
25 87:8,9,11,	75:17 76:3	<b>depositions</b>	73:21 78:17
13 88:17	79:8 80:13,15	6:18	79:4 80:9
91:20,23	82:18,19 84:8	<b>depth</b> 61:4	81:6,13 84:5
92:1,5 96:15	85:25 86:11	64:13 70:11	95:16 98:4,18
99:17 100:17	87:1,19 88:20	<b>describe</b> 14:5	99:2 100:15,
102:6 107:9,	94:4 95:16,17	48:7	22 103:8,11,
17 108:20	97:7 101:1	<b>described</b>	13,19 104:2,
109:19	102:9,10,19	56:10	5,8 105:17
110:10,11,12	105:7 108:21	<b>describing</b>	107:12,15
112:2 116:14	110:16 114:1,	84:15 136:13	109:11 112:7
118:1,22	25 117:4,7	<b>detail</b> 23:18	113:21 115:1,
119:7,11	118:9 124:12	62:9,13	20 118:18,20
126:3,24	130:19	<b>details</b> 26:3	121:4,8,11
145:17,18	148:19,20	43:9	122:5,7,9,18,
147:19 149:3	149:9 150:4,	<b>deter</b> 119:3	23 123:5
151:6	7,8,16	<b>determine</b>	124:25 125:1,
<b>day-to-day</b>	<b>decide</b> 33:16	112:13	11,13,15,19,
106:8	131:17	<b>develop</b> 23:21	25 126:15,18
<b>days</b> 17:19	<b>decision</b>	117:22	127:2,3,13,
72:20 81:1	66:1,2	<b>development</b>	17,21 128:10,
82:17 91:9	<b>deck</b> 38:20	114:21	19,22 129:2,
101:12 105:21	<b>decreasing</b>	<b>developments</b>	6,10,13,19
138:7	67:21	17:14	130:5,6,9,10
<b>dead</b> 66:6	<b>decub</b> 98:17,	<b>devised</b> 34:9	131:7,9,15
<b>deadline</b>	19 100:11	<b>diagnose</b>	132:4 139:6,
51:12	<b>decubitus</b> 9:8	60:18	14 140:23
<b>deal</b> 43:3	22:6 23:9	<b>did</b> 8:8,11,	146:8,25
50:8	31:23 62:18	17,22 9:1,3,4	148:11,24
<b>dealing</b> 39:1	93:22 99:10	10:25 11:22	149:1,5
<b>debridement</b>	108:21 129:5	15:11,16	150:3,7
66:3,4,5	148:18 151:1		<b>didn't</b> 16:14
			22:17 32:8,24

November 18, 2020

12

33:7 36:14 37:19 40:1 45:14 46:14 52:12 53:24 71:15,16 93:2 99:14 100:13 101:9,16,18 103:5 113:23 115:10,18,21 121:15 122:7, 15 125:20 126:4,7 132:19 136:8 138:2,10 140:22 144:17 145:24 154:8, 19 <b>died</b> 119:25 <b>difference</b> 31:6 <b>different</b> 12:15 13:17 15:13 16:19 32:2,3,5 52:7 65:13 69:11 71:2 75:23 80:17,25 81:4 85:5 86:12 94:8 101:13 103:14 110:9, 11 111:6 153:13 154:1 <b>differently</b> 47:10 77:20 <b>difficult</b> 55:9 61:11 97:15 <b>difficulties</b> 13:13 <b>director</b> 50:2 51:22 52:8 132:22 <b>disappear</b> 126:3 <b>disappearing</b> 127:5 <b>disclose</b> 122:8	<b>discoloration</b> 62:5 <b>discovered</b> 116:20 <b>discuss</b> 33:24 55:4 119:22, 24 120:16 129:2,3,5 131:14,18,25 134:2 136:23 <b>discussed</b> 40:7 43:19 83:24 84:2, 11,14 86:16 107:5 117:14 119:19 120:1, 20 123:2,7,8, 9,10,11 130:22 131:20 136:10 139:25 140:6,9 <b>discussing</b> 18:6 62:10 107:3,6 109:20 140:3 154:20 155:18 <b>discussion</b> 21:17 27:6 33:20 97:25 117:2 119:8, 13 130:14 135:11 156:15 <b>discussions</b> 27:11 117:8 127:19 140:4 <b>dishonest</b> 32:1 33:2 <b>distinctly</b> 101:14 <b>divert</b> 119:4 <b>diverting</b> 118:23 136:9 <b>divvied</b> 85:14 <b>divvy</b> 105:22 <b>do</b> 5:7,13 6:12,19 7:22 10:4 11:15, 20,21 12:12	17:3,23 18:12 19:6,12 20:24 21:11,23 22:1,12,25 23:15 25:4 26:8,12,19,24 27:19 28:17, 22 29:1 30:2, 18 31:2 32:3, 8 34:8,17 35:4,8,9,12, 13,14,16 36:6,12,16 37:5,14,18,24 38:1,2 39:20, 22 40:11 41:12,15,20, 25 44:2,4,10, 13 45:24 46:6,12,18,22 47:6,10 48:16,17 49:9,19 50:19 51:16 53:14, 16,19 57:3,9 58:3,6,12,16, 19 59:4 60:16,22 61:2,7,8,15, 16,24 62:7,14 63:2,4 64:8, 19 65:12,17, 21,23 66:17 67:9,15 68:5 69:13,20,24 70:5,16,25 71:4,20,22 72:23 73:25 74:23 75:17 76:7,14 77:22 78:12,19,25 79:16,19 80:20,25 81:5 82:18,25 83:9,15,18 84:3,4,6,24 85:7 87:2 88:21 90:11 92:19 93:1,2,	22 94:8,11 95:21 96:11, 13,19 98:18 99:2 100:3,8, 21 101:3,24 102:25 103:1, 25 104:2,12, 17,24 105:8, 20 106:24 107:3,9,25 108:8 109:11, 20 111:22 113:4,16,17, 23 115:3 116:5,16,21 117:1,16 119:7 120:19 121:6 123:2, 21 124:3,7, 10,21,25 125:24 126:2, 15 127:18,21 128:8,12 129:22 130:9, 17,25 132:2, 6,8 133:3,5 134:20,23,24 135:25 136:10,17 138:9,16,20 139:9,12,16 141:17 143:9, 14,23 144:2 145:25 148:20 152:21,22 153:9,24,25 156:17 <b>doctor</b> 47:19, 25 65:6 66:24 68:8,22,24 75:2 104:5 111:15 <b>doctor's</b> 110:21 111:9 <b>doctor-doctor</b> 67:1 <b>doctors</b> 36:16 48:2 55:9 65:9 68:25
--	---	--	---

November 18, 2020

13

115:6 154:16 155:9 <b>document</b> 71:13 79:1 122:14 133:5 134:21 <b>documentation</b> 78:13 93:9 111:11 122:24 130:11 135:13 <b>documented</b> 76:5 79:2 80:19 <b>documenting</b> 138:15 <b>documents</b> 9:18 30:22 31:1 34:22 125:22 <b>does</b> 7:9,11 14:12 15:25 18:14 26:18 30:8 39:7 47:17 48:24 49:22 51:20 58:17,24,25 59:21 61:6 64:11 68:7, 21,23 70:8 72:14 77:20 79:19 81:18 83:14 90:13 91:7,18 92:21 94:24 95:24 102:13 103:17 106:15 108:7, 8 109:8 116:2,7 134:9 138:5 152:13 153:4 <b>doesn't</b> 7:13 59:13 92:6,10 94:14,18 102:13 103:12 111:7 115:10 142:4 152:4 <b>doing</b> 6:10 13:23 17:20 28:15 32:7	35:11 46:10 59:19,22 63:25 78:2 83:12 98:5 99:14 104:13 126:24 <b>don't</b> 7:5,14 8:6 15:15 16:23 18:4 19:9,22 21:14 22:21,24 23:3 24:16 26:11 27:9 28:5,13, 20 30:12,14, 21,23 32:17 33:6,15 34:10,20,22, 25 35:1 38:3, 20 40:23,24 41:1,2,17,18 42:4 43:6,9, 10,11,15,17, 18 44:12 45:22 46:21, 25 47:3 50:4, 23,24 51:5,8 52:11 53:24 54:8,21,24 55:5 57:5,18 58:8 59:7,9 60:1,19,21,24 62:11,13 63:21 69:6, 14,15 73:20, 22 75:3 78:21 79:2 81:9 82:5 85:5,8 89:13 92:15, 23 93:14 94:19 95:3,6 97:25 98:2,3 100:20,22 104:4,8,15, 21,23 107:1,5 109:12,24 110:19,23 111:20,24 112:2,3,4,14 113:20	114:19,22 115:18 116:19,25 117:8,17 119:10,18 120:3,21 121:14 123:1, 5,10,15 124:5,8,14, 16,20,24 125:1,2,23 126:1 127:1, 7,15,24 128:11 129:4, 9,12,18,21 130:8,13,20, 22 131:7 132:7,21 133:8 135:21, 22 136:2,12, 18 137:7 139:2,3,4,8, 15,20 140:9 142:22 144:2 146:15,25 147:14 148:10,14 152:8 153:12 154:5,13,17, 23 155:11 <b>done</b> 20:24 36:22 45:25 46:11 48:2 49:24 50:15 51:15 65:25 71:3 76:17 88:12 107:20 110:5 120:7 128:1 131:19 142:6 <b>door</b> 55:17 <b>dot</b> 79:17,19, 23 80:6 81:12,15 82:3 <b>double</b> 59:5 126:15 <b>doubling</b> 85:16	<b>doubt</b> 38:2 <b>douche</b> 28:21 29:2 <b>down</b> 6:20,25 22:9 57:25 61:21 69:2,23 70:24 75:15 95:7 142:7 144:5 146:11 147:3 <b>Dr</b> 5:10,14,19 11:20,23 15:11 21:9, 23,25 22:8,12 23:4 27:7,10 37:5 38:11 40:7 45:18 50:1 51:7,14, 23 52:1 53:11 54:13 66:17, 23 69:19 73:25 74:13, 19,22,25 75:4,16,22 76:9,14 77:2, 8,10 79:9 80:9,15,16 81:2,14,25 82:24,25 83:2,17 84:4, 5,9 85:22 86:1,2,12 87:1,19,20 88:16 89:6,8, 17,20,25 90:4,10 91:13 92:17 93:16 94:5 106:11, 12,14,24 107:4 109:18, 19 112:4 113:4,10 117:9,10,14 118:3 119:9, 14 122:20,21 123:8 128:8, 10,12,21 130:10,15,18, 20 132:3,9,10
--	---	--	--



November 18, 2020

14

133:4,14 135:2 138:12 139:13,25 140:6 148:23 151:10,11,21 152:4 <b>dregs</b> 146:23 <b>dressing</b> 70:22 <b>dressings</b> 65:13 110:2 121:18 <b>drop</b> 99:14 <b>drugs</b> 7:25 <b>due</b> 62:23 <b>during</b> 15:12 16:8,22 17:18 19:6,13,19 20:22 23:19 25:19,21 26:6,8,13 29:8 34:13,23 36:25 37:1 48:14 56:25 57:21 63:7 65:4 72:8 78:14 84:2 85:10 86:16 103:16 105:4 106:1 115:9 123:21 126:3, 10 143:20 148:8,11 155:18 <b>duties</b> 13:2 113:19 <b>duty</b> 113:2 <b>Dyse</b> 69:24 89:1 95:16 97:7 98:5 111:22 114:25 123:4	58:17 72:7,24 77:11 112:5 116:7,9 <b>Earl</b> 21:25 22:8,12 27:7, 10 50:1 51:7, 14,23 52:1 117:10,14 118:3 119:14 122:21 123:8 128:8,10,12, 21 130:10,15, 18 132:9,10 133:4,14 135:2 139:13 <b>earlier</b> 8:16 34:16 38:10 45:4 60:25 62:16 71:15 84:23 89:3 93:16 98:3 99:24 108:3 111:18 121:16 137:9 146:16 149:12 155:19 <b>early</b> 96:17 98:11,17 99:9 100:10 103:20 107:16 108:21 150:20 <b>ears</b> 55:11 <b>easy</b> 99:25 <b>educated</b> 30:15,17 <b>education</b> 10:15 32:20 <b>educational</b> 20:4,6 132:1 133:12 134:2 136:14 <b>effect</b> 153:11 <b>efficiency</b> 13:14 <b>either</b> 15:1 17:10 27:7 52:3 56:9 64:3,16 74:15 111:2,10	115:12 131:5 <b>elicited</b> 75:25 79:15 81:2 92:18 93:17 94:6,14 <b>Elizabeth</b> 5:12 <b>else</b> 9:13 22:25 31:21 35:5 36:24 42:4 48:3 54:11 69:5 100:19 104:10,17 107:10 109:21,22 127:3 129:10 130:10,17,23 134:10 139:24 149:25 <b>else's</b> 85:20 <b>email</b> 8:25 21:25 22:2,4, 10,11 27:5,15 36:3 41:22 57:17 74:15 117:12 122:17,18 130:7 140:19, 22,23 <b>emailed</b> 8:24 <b>emails</b> 24:15 <b>emergency</b> 38:19 39:2 99:12 <b>encompasses</b> 155:7 <b>end</b> 19:25 57:20 58:22, 23 82:2 124:15 136:8 147:22 148:5 <b>end-of-the- shift</b> 99:23 <b>enjoyed</b> 75:4 <b>enough</b> 33:11 145:25	<b>enter</b> 105:17 <b>entered</b> 73:25 82:19 89:1 91:12 95:23 105:8 <b>entering</b> 32:20 78:15 <b>enters</b> 74:13 <b>entire</b> 55:25 72:18 91:11 <b>entry</b> 87:2,11 <b>enzymatic</b> 65:12 <b>enzyme</b> 70:22 <b>Epic</b> 82:14 91:22 126:21 <b>Epic-generated</b> 82:15 <b>equivalent</b> 20:19,20 106:14 <b>ER</b> 16:4 17:17 126:8 144:5 147:3 <b>errand</b> 36:20 <b>eschar</b> 97:16 118:15 <b>especially</b> 39:3 144:15 <b>essentially</b> 17:24 64:12 67:21 82:8 <b>ethics</b> 128:23 <b>evaluate</b> 17:17 <b>evaluated</b> 16:5 <b>even</b> 25:9 28:23 32:21, 23 33:25 43:6 46:9 51:8,17 52:21 59:16 67:4 81:15 84:1 90:5 102:21 108:5, 13 113:25 114:8 117:24
<hr/>			
<b>E</b>			
<hr/>			
<b>each</b> 6:21 7:21 36:21 46:9 56:7			

November 18, 2020

15

121:4 132:10, 25 134:8 140:9 148:7 154:4 <b>event</b> 90:20 120:20 <b>events</b> 90:18 119:23,24 121:25 122:4 141:7 <b>eventually</b> 118:22 <b>ever</b> 5:22 6:6 7:22 34:17 35:4 36:23,24 40:7 48:1 49:9 54:18,24 55:1 59:4 65:17 76:13 93:14 111:13 116:17 120:1 126:18 127:13 128:10 147:6 150:3 152:7 <b>every</b> 7:18 9:22 16:24 17:4 18:6 19:1 20:1,20, 22 24:1 25:24 28:4,6 29:9 51:19 52:2,3 61:16 69:12 71:25 72:3, 10,15 73:5,12 77:20 82:5 85:13 89:11 90:2 91:20 110:13 118:1 126:5 131:1, 2,11,23 135:22 147:19 149:3 <b>everybody</b> 112:21 121:2 124:17 <b>everybody's</b> 112:24 <b>everything</b> 6:19 21:4	22:5 63:4 126:24 133:17 156:9 <b>exact</b> 18:4 19:22 22:21 28:14 109:12 139:4 <b>exactly</b> 34:14 52:24 53:24 100:22 112:4 117:17 123:15 <b>exaggeration</b> 146:7 <b>exam</b> 17:5 23:17 61:9,16 62:14 77:5,7, 8,9 78:5,7 137:2,8 138:15 149:2, 3 <b>examination</b> 5:8 62:2 76:14,18 140:14 148:24,25 152:2 <b>examine</b> 76:16 80:10 <b>examined</b> 76:1,10 78:9 79:15 81:3 94:6,20 <b>examiners</b> 120:25 <b>example</b> 58:21 81:22 131:16 <b>examples</b> 31:24 54:9,21 56:9 59:8 148:15 <b>exams</b> 58:12 59:20 83:22 136:25 <b>Excel</b> 134:20 <b>except</b> 20:1 116:10 117:9 140:21	<b>excuse</b> 143:24 <b>exemplified</b> 46:4 <b>exercise</b> 40:7,8 <b>exercising</b> 36:25 39:19 <b>exhibit</b> 21:19,20 27:6 29:16,17 35:21,25 37:4,7 41:9 42:21 46:16 49:18 53:15 66:20 69:7 73:23 74:2 75:14,19 79:7,11 80:12,22 82:16,21 84:7,20 86:4, 22 87:4,18,24 88:19,23 98:15,21 101:5 105:6, 14 114:9 140:18 <b>exhibiting</b> 28:11 <b>expand</b> 24:20 <b>expect</b> 33:11 55:11,13 61:7,8 62:14 116:13 133:24 <b>expectation</b> 112:9 143:2,8 <b>expected</b> 144:25 <b>experience</b> 25:8 62:17 107:15 118:15 <b>experienced</b> 75:2 83:5 111:23 <b>experiences</b> 73:3 <b>expert</b> 7:12	<b>explain</b> 12:6, 16 15:24 27:22 32:18 62:19 <b>express</b> 62:6 <b>expressed</b> 121:24 122:3 <b>extended</b> 116:12 <b>extra</b> 46:10 <b>eyeball</b> 63:20,21 <b>eyes</b> 55:11 61:10 62:3 72:12 75:12 <hr/> <b>F</b> <hr/> <b>fact</b> 138:5 146:9 150:11 <b>facts</b> 8:2 <b>failure</b> 73:4 <b>fair</b> 18:1,19 29:7,13 40:13 50:9 52:15 54:8 65:8 67:24 75:6 79:4 97:22 99:13,21 102:18 115:9 126:10 147:6 155:25 156:2 <b>fairly</b> 97:21 <b>fall</b> 50:4 <b>far</b> 52:11,12, 14 118:14 128:16 145:12 156:11 <b>fast</b> 143:18 <b>faster</b> 7:19 <b>fault</b> 115:23, 25 116:1,3 <b>febrile</b> 90:11,19 <b>February</b> 120:5
--	---	--	---

November 18, 2020

16

<b>FEDERAL</b> 5:2	<b>field</b> 13:7	71:12 115:23,	28:20 29:18
<b>feedback</b>	<b>fifth</b> 11:2	25 152:18	31:18 33:1
127:14,16,23	19:4 43:23	153:1	35:4,17,19
147:18,24	51:16 131:8	<b>firsthand</b>	36:1,5,10,21,
148:3	<b>fifth-year</b>	122:5	22,24 37:8,
<b>feel</b> 37:19	12:4 14:17	<b>five</b> 10:3	11,20,21,25
40:1 51:14,19	133:17	30:18 53:5	38:19 41:15,
55:24 61:22	<b>figure</b> 61:25	91:9 95:11	23 42:22
69:14 102:2	<b>file</b> 71:23	97:2 131:17	43:20 44:17,
108:6,16	73:9 135:23	155:12,14	18 45:11 47:5
109:4 111:11	<b>filed</b> 88:8	<b>five-minute</b>	48:15 49:4
113:7 119:1	<b>filled</b> 116:18	53:1	51:5,7 52:8
122:7 124:23	<b>final</b> 91:9,17	<b>fix</b> 84:1	53:5 55:18,19
130:2 136:4,	<b>find</b> 8:22	<b>flat-out</b> 31:7	56:10,13
22 144:3	51:3 93:7	<b>flipped</b> 78:9	58:21 60:2
146:24 152:14	128:19 139:6	<b>float</b> 20:14,	61:18 62:11,
153:2 154:9,	146:8	25 45:12	12,22 63:25
12	<b>findings</b> 76:4	47:23 143:5,7	64:8,14,23
<b>feeling</b>	80:18	<b>floor</b> 13:22	66:8,14,21
32:13,16	<b>fine</b> 6:15	16:25 37:22	67:9,10 68:22
<b>feels</b> 61:23	<b>fingers</b>	48:9,10 55:12	69:8 70:18
<b>fellowship</b>	101:18 102:16	56:23 73:2	71:1 73:11,
10:25 11:4,25	<b>finish</b> 6:24	89:8 105:23	13,17 74:3
23:19 62:20	7:3 11:2 93:7	142:11	75:20 76:11,
<b>felt</b> 22:7	<b>finished</b>	<b>floors</b> 44:21	17 77:25
23:12,17 28:1	11:10 109:17	<b>follow</b> 65:21	78:19,22
32:1 33:2,18,	<b>fired</b> 139:1,	67:19 140:13	79:1,12 80:23
19 34:5 39:2	2,3,7	<b>following</b>	81:10,14,22
42:3 54:22	<b>first</b> 8:14,	13:25 16:17	82:1,11,13,22
107:15,24	22,24 13:9	108:1	83:17,19,24
119:16,17	14:1 15:5,6	<b>follows</b> 5:6	84:18,21
123:23 127:5	21:8,9,11,18	<b>followup</b> 7:2	85:15 86:5,7,
130:4 131:23	25:16 34:23	151:25	11,23 87:1,2,
132:10	37:18,20,23	<b>for</b> 5:11,24,	5,11,19,25
146:19,21	38:21 40:6,19	25 7:1,4,6,10	88:24 89:14
147:1,17,22	72:17 85:15	8:4,5,12,23	91:2,5,6,7
148:12 149:5	86:8 89:10	9:2,15 11:15	92:2,4 96:17,
153:19 154:15	90:6,15 91:23	12:9,10 13:1,	19 98:11,17,
<b>female</b> 123:23	92:5 96:14	6,17 14:1,18,	22 99:7,24
124:3 146:15	104:1,25	22 15:18	101:6 104:3
147:8 153:18,	105:2 107:2	17:5,9,21,23,	105:7,15
24 154:4	114:10 137:24	25 18:2,12	106:2,3
<b>fever</b> 90:14,	139:6 142:11	19:17,19	107:13,23
20 91:3	147:22 149:10	20:1,17,24	109:5,6
<b>few</b> 6:16 54:1	150:25 151:7	21:15,21	111:2,10
73:4 111:6	<b>first-year</b>	23:20,22	112:8,16,22
128:2 140:13	13:17,21	24:1,3 25:3,	113:10,12
	14:13,14 45:6	15 27:20	114:11,20,21
			115:19,23



November 18, 2020

17

116:1,3,7,9, 11,16,18 118:17 120:9 121:19,23 122:15 125:21 127:2,5 130:9 133:8,9 135:4 136:18,21 137:1 138:1 139:22 140:21 143:2 144:5 145:2 147:23 148:18 150:14 151:6 152:21, 25 153:2,16 <b>form</b> 45:16 56:16 67:11 112:17 114:13 125:16 133:6 140:1,8 <b>formal</b> 122:19 <b>format</b> 131:7, 9 <b>forth</b> 112:9 <b>forthcoming</b> 137:2 <b>forward</b> 83:21 <b>found</b> 22:5 50:17,25 145:16 <b>four</b> 10:3 20:13 21:1 81:16 88:11 101:12 110:22 <b>four-year-old</b> 10:12 <b>fourth</b> 11:2 12:25 14:18 19:3 20:15 43:24,25 51:16 69:14 <b>fourth-year</b> 12:3 14:16 <b>frame</b> 19:13, 20 25:16,20 39:8 48:14 56:25 57:1,2 62:17 63:7	117:4 <b>frame-wise</b> 11:23 <b>Friday</b> 17:19, 22 19:19 <b>from</b> 8:2 9:5 11:24 16:3 19:15 20:2 21:25 23:9 25:25 26:1 27:24 33:18 36:4 41:2,21, 22 49:23 52:5 53:8 59:18 68:14 71:11 75:5,16,22 76:1 77:14 79:8,15 80:12 83:21 84:8 89:7 92:17,18 93:17,18 94:6,9,10,15, 17 96:4 97:4 102:10 104:15 107:9 110:15 112:10 119:5, 16 127:4 128:5,13,24 130:16 131:24 133:11 142:13 146:23 148:13,19,23 <b>front</b> 28:6,12 34:6 35:8,12, 14 53:22 154:15 <b>frustrated</b> 38:23 107:17 144:3 148:15 <b>full</b> 5:10 59:19 61:16 94:20 <b>fully</b> 81:8 <b>further</b> 46:4 146:5	<b>G</b> <b>gap</b> 10:21 <b>gaping</b> 25:10 <b>garage</b> 126:18 <b>gave</b> 27:19 41:24 51:6 113:8 127:23 <b>general</b> 10:24 11:2 12:14 13:3,7 32:6, 13,15 <b>generally</b> 14:1 51:18 <b>Georgia</b> 5:15 11:12,17 <b>get</b> 14:25 15:2 17:4 24:23,24 28:23 31:14 46:11 50:14 61:4 62:23 70:14,15 76:18 87:12 91:4 94:20 95:7,9 99:4,7 106:1,2 108:3 111:3 114:24 116:12 119:2 128:14 131:13 134:9 135:2 138:10 143:22 144:7,8,17 <b>gets</b> 46:11 95:23 96:1,2, 5 124:17 <b>getting</b> 39:18 62:20 66:6 110:16 111:8 119:7 143:17 <b>give</b> 24:18 29:21 33:15 59:2 72:4 95:11 107:22, 23 108:10,12, 17 109:1 113:21,23	119:3 127:13, 16 130:10 132:15 135:13 137:17 139:23 147:18 <b>given</b> 6:16 69:19 89:13 113:3,7 <b>giving</b> 32:25 94:19 107:25 113:9 148:3,4 <b>go</b> 18:17 21:15 25:24 26:2 30:25 35:17,18 36:5 37:11,25 39:24 40:3,20 41:9 42:6 43:2 46:16 47:10 49:18 50:7,13 53:13 58:17,19 61:8 62:9 63:21 65:5 72:12 75:15 82:17 89:21 90:8 94:3 95:15 96:18 99:3,4, 12,14 100:8 108:7 113:13 114:8 115:20 120:22 124:23,25 125:13,19 126:6,21,25 128:2 129:13 130:6 131:10, 13,22 132:25 133:4,15 135:16 137:19 138:1 144:20, 23,25 147:3 148:6 149:19 150:17 151:14 152:11,15 154:11,14 <b>goes</b> 7:19 83:7 90:4 95:25 106:22
---	---	---	---

November 18, 2020

18

128:17 153:13 <b>going</b> 6:22 8:4,23 12:22 17:6 21:12,18 22:19 23:18 27:11 28:4 29:4,13,15,22 31:14 32:20 34:18 35:20 36:10,13,22 37:3 38:13 39:6,10 40:2, 3 41:7,11,25 46:16 51:2 52:25 55:15 58:23 59:19, 24 63:22 66:12 69:2 73:3,23 75:23 78:25 79:7 82:16 86:25 89:18 94:3,13 97:7 100:24 102:15 103:6 106:7 111:11, 17 115:6 118:16 120:22 125:24 128:20,23 131:16 140:16 146:4 149:8 150:13 152:6, 19 <b>gone</b> 102:1 111:5 125:21 <b>good</b> 7:2 38:20 39:3 53:11 55:14, 16 56:1 83:16 95:8,9 108:6 127:21 131:24 148:3 <b>gosh</b> 71:5 124:21 <b>got</b> 11:11 26:1 28:2 30:15 33:4 37:16 50:13 59:2,24 82:10	94:9,17 96:21 99:2,13 111:4,16 116:1 118:22 140:11 <b>graduate</b> 49:23 <b>graduated</b> 10:16,19,21, 23 11:3 <b>graduation</b> 10:25 <b>gram</b> 91:24 <b>gram-positive</b> 91:24 <b>gray</b> 42:11 <b>great</b> 62:13 <b>Greene</b> 22:1 27:8 123:9 <b>Griffin</b> 129:17 130:20 <b>ground</b> 6:17 124:11 <b>grounds</b> 59:17 <b>group</b> 51:23 120:17 135:9 154:16 <b>growing</b> 92:4 110:14 <b>grown</b> 91:22 <b>guess</b> 11:7 24:1 30:14, 15,17 42:1 43:8 46:1 108:11,25 109:18 114:5 116:5 134:6 136:16 142:8 147:5 153:6 <b>guessing</b> 38:22 68:9 <b>guidelines</b> 67:19 <b>gunshot</b> 16:3 93:5 <b>gut</b> 137:17	<b>guy</b> 150:20 <b>guys</b> 8:11 138:10 <hr/> <b>H</b> <hr/> <b>habit</b> 71:25 127:16 <b>had</b> 5:22 6:1, 6,12 8:7 16:14 19:14, 15,22 20:21 22:6,7,10,17 23:13,17,20 24:1,2,4 26:10 27:6,24 32:1,8,13 34:13,17 35:7,16,23 37:15 38:16 39:24 40:2,7, 14 41:1,22 42:1,2 45:20, 25 50:3,18,25 51:1,9,15 52:10,15 54:16,18 55:6 57:14 58:1 59:7,8,11 60:3,7,8,10, 11 62:16 63:19,23 64:5 71:19 72:1 73:3,4 75:9 81:10,12,15 82:4,7 90:6, 14,20 91:15 97:17 99:8 100:5 101:15, 18,20,22 102:1,2,4,5, 16 103:4,7 104:19 105:3 107:12,16 108:14,16,20 109:22,23 110:9,23 113:2,25 114:4,18,23	117:6,18,19, 20,22,24 118:3,10 119:17 120:25 121:3,5,9,25 122:3,9,16 123:12,22 126:11 128:14 130:4,21,22 131:10,24 132:14,17,23 136:5 137:1,9 138:17 140:22 141:25 144:19,22,23 145:10,13,16, 18,21,25 146:2,9 147:12,21 148:6 150:4, 8,20 152:12, 14 153:9 154:9,20 <b>hadn't</b> 51:3 59:22 89:19 137:16 147:24 <b>half</b> 8:19 15:12 25:16 106:2 <b>halfway</b> 6:22 <b>hallway</b> 58:22 109:13 <b>hand</b> 58:16 <b>hands</b> 38:20 <b>happen</b> 58:24 63:2,5 96:1 107:15 133:24,25 <b>happened</b> 22:7 26:15 27:3 31:24 41:18 43:6 48:4 56:13 78:24 96:22 111:4 118:18 137:3, 4 141:9 148:1 155:19 <b>happening</b>
--	---	---	---

November 18, 2020

19

134:9 141:11 <b>happens</b> 9:22 33:11 95:23, 25 131:18 136:6 <b>harassed</b> 147:8 <b>harassing</b> 146:19 147:13 <b>harassment</b> 125:4,7 153:21 154:18 <b>hard</b> 92:5 <b>has</b> 5:19 6:16 19:3,4 49:4 64:8 73:12 74:6 75:11 76:22 78:24 82:12 83:14 91:3,10,21 99:10,18 100:12 102:21 104:7 111:13, 14 112:15 114:16,17 116:4,11 133:6 141:9 147:6 <b>have</b> 5:16,22 6:6,14,19 7:2,21,22 10:2,4,12 12:21 13:7 14:9,24 17:17 18:5,22 19:16 20:4 21:5,6, 8,12 22:14,20 24:3,5,25 25:12,23,24 26:5,19,24 27:11 28:5,24 30:5,9,19,25 31:2,5,17 33:2,10,19 34:13,18,21, 23,25 35:1 36:23 38:2,20 42:4 43:7,8, 25 44:7,8,15	46:2,19,20 47:2,22 48:1, 2,19,24 49:12,15,17, 24 50:8,25 51:8,15 52:6, 12,18 54:1, 16,18 55:6, 14,16,20 56:1,22,24,25 57:5,19 58:4 59:10 61:1,17 62:4,12 63:7, 10 65:4,24 66:7 67:3,4 68:20 69:4,5, 15,24 70:16 71:9,22 72:3, 6,10,20 73:12,13 75:7,9 76:15 77:2,22 78:17 79:17 81:7, 19,24 82:5 83:24 84:1,4 85:10,12,23, 25 86:1,7,19 88:12,17 89:11,13,15, 25 91:9,12, 14,16 92:1,6, 9 93:10 94:18 96:8,10,22 97:10,22 98:14 100:5, 20 103:11,12, 17,19 104:5, 19,24 105:2, 20,21 106:4, 7,16,18 107:5,7,9,19 108:13,14 109:7,8,17, 19,24 110:4, 7,10,12,15,20 111:7,19 112:1 115:1, 12 116:2,7, 19,21 117:25	119:7,10,12, 15,25 120:4 121:12,21 122:7,8 123:9 124:14,15 126:2 127:18, 24 128:12,13 129:6,16 132:25 134:2, 4,7,10,11 136:1,2,5,6, 7,20 137:25 138:5,6,18,22 139:18,20,25 140:6 141:11 142:4,6 144:23,25 145:22,24 146:4 149:10, 14 150:11,12 151:25 152:13 154:22,23 155:19,21 156:16 <b>haven't</b> 56:6 89:7 137:10 <b>having</b> 13:13 28:1,3,11 30:8 33:19,20 47:16 53:23 54:5,19 64:7 140:5 142:17 144:20 147:18 <b>he</b> 5:19,20 19:10 23:15, 17 26:11,19, 21,23 28:10, 14,23 31:16 32:1,8,11 33:2,25 35:18 36:5 37:20,23 38:1,17,24 40:2 42:1,3, 16 44:3,15 45:6,10 46:3, 14 47:4,14, 16,24 49:19 50:25 51:3,9 52:12 55:7	57:1,2,19,21 59:7,8,11,13, 14,16,18,21, 22,24,25 60:16,17,19, 20,21,22 74:22 75:1,4 76:9,10 77:17 79:14,15 85:7,10,12 88:10 90:19 92:11,17,18 93:5,10,17,19 94:7,9,14,20, 24 95:2 96:3, 15 99:8,9,18 100:10 101:8, 17 102:2,4,5, 8 103:4,10, 11,13,18,19 105:17 106:21 107:11,12 108:14,16,19, 20 109:8 113:7,19,21, 23 114:6,23 117:6,20,22, 24 118:5,6, 18,20,21 119:11 120:3 121:5,9 122:15 125:20 126:5,6,8,12, 14 127:1,23 128:22 129:1, 2,4,7 130:4 137:1,5,6,24 138:14,16,17, 22,24 139:1, 2,3,6,14 141:22,23,25 142:20,22,23, 24,25 143:11, 21,23 144:5, 8,12,14,15, 16,17,19,23 145:10,11,12, 16,18,21,23 146:2,6,9,19
--	--	---	---

--	--	--	--

November 18, 2020

21

<b>hospital</b> 11:15 18:2 19:21 37:20 38:9 43:5 49:10 59:21, 23 73:5 82:12 112:22 117:3 128:24 132:15 136:1 142:12, 15,16 155:16		123:25 125:22 133:1 137:21 140:11	64:5,7,25 65:3,12 66:15 70:2 73:22 77:25 78:3,8, 12,19,25 79:2,4 81:22 83:25 84:1 85:22 88:7 90:15 91:3,21 92:6 93:3,19 95:7 97:13, 15,17 98:15 103:16,23,25 104:17 106:6, 9 108:14 110:10,14 111:2,8,22 112:11 113:21 116:11,25 117:20 118:5, 13,21 119:11 120:19 122:9 123:2 124:10 125:6 127:1,4 128:15 131:17 132:2,24 135:4,14,24 136:1,4,18,20 137:24 138:17 140:18,22 141:10 142:23 143:3,8,13 144:4,5,9,22 146:6,24 148:2 152:4,8 153:9 154:4, 9,12 155:16
<b>hour</b> 7:18 8:19 42:19 49:5 53:1 73:7	<b>I</b>		
<b>hours</b> 52:23 88:20 92:9 139:22	<b>I'D</b> 29:9 38:15 61:4 95:9	<b>ICARE</b> 116:17 <b>ICU</b> 15:1 17:1 23:19 66:24	
<b>how</b> 5:16 6:20 8:5,11,17,22 10:2,6,8 17:20 18:13 20:18 35:8 44:23,24 49:19 50:3,24 51:3 52:7,11 57:7 58:9,17 62:6,13 64:16 74:20 78:15 81:18 83:14 84:3,4 85:7 87:14 91:7 92:15 94:12, 21 96:19 97:24 98:19 103:1,3 104:7 113:23 119:18 123:23 127:2 128:16,19 131:15 133:20 134:7,9 149:5 155:10	<b>I'LL</b> 6:21 7:6 29:21 37:3,10 73:20 75:14, 15 80:12 82:17 96:25 114:8 128:2 140:3	<b>idea</b> 50:12 65:24 <b>IDENTIFICATION</b> 21:21 29:18 36:1 37:8 42:22 66:21 69:8 74:3 75:20 79:12 80:23 82:22 84:21 86:5,23 87:5,25 88:24 98:22 101:6 105:15	
<b>HR</b> 132:17 154:6,7,12,14	<b>I'M</b> 6:16,23 7:1,12 8:4,15 12:11 22:19 23:8 29:4,15 34:13 35:20, 22 38:13,22 39:6,10,18 40:3,17 41:7, 8,10 43:7 44:4,11 45:13 46:16 48:4 53:2 54:17 60:9 61:25 64:25 65:25 66:12 68:9 69:2 73:3,23 75:23 77:1,6 79:7,22 81:23 82:16 85:4 86:25 87:18 92:20 93:19 94:3,12,21 96:21 97:24 100:24 102:15 108:1,25 109:7 116:5 117:17 118:15 120:22 123:1 129:4 131:16 133:2 134:6 136:16,19 140:16 146:22 147:16	<b>if</b> 5:10 7:9, 12,16 10:14 12:6 13:12 15:15,24 16:5,14,21 17:13,17 18:10,12,16 19:12 21:11, 12 22:8,17 23:8 24:16,24 25:4,9 27:22 28:8,14 30:14,23 31:13,16 33:1,21,25 34:16 35:7,10 37:21,24 39:8 40:2,24 41:1, 3 42:5 43:6, 10 46:9,17 47:10,24 48:14,22,25 49:2,4,5 50:5,6 51:9, 25 55:14,16, 20 56:1,4 59:11 60:21 61:22,23 62:4,18 63:12,19,23	
<b>huge</b> 25:10 <b>Huh-uh</b> 87:17 <b>huh-uhs</b> 7:5 <b>Human</b> 125:7, 11,13,15,19	<b>I'VE</b> 10:12 28:19 41:21 47:8 73:3		<b>ignorance</b> 20:18 <b>imagine</b> 31:10 74:14 87:15 97:19,20 120:8 127:17 <b>immediately</b> 55:21,23 99:3 102:16 <b>in</b> 5:15,19 6:1,9,11,12 7:1,22 8:23

November 18, 2020

22

9:1,8,12,24	18 83:18 84:1	<b>in-patient</b>	137:2
10:18,19,20,	88:16 89:8	69:18	<b>initial</b> 90:5
21,23,25	90:17 91:14,	<b>inaccurate</b>	118:22
11:1,3,12	22 93:3,6	108:5 114:7	<b>initially</b>
12:1 13:2,8,	95:7,24,25	<b>inappropriate</b>	90:1
12,20,22 14:8	96:2,6,15,17,	42:2,3 127:12	<b>initiate</b>
16:2,4 17:10,	23,25 97:14	147:15	65:5,6
17 18:1,2,7,	98:11,12	<b>inappropriatel</b>	<b>initiated</b>
9,14 19:1	100:9,17	<b>y</b> 154:11	66:17
20:3 21:3	101:13 102:13	<b>incident</b>	<b>injuries</b>
22:9 23:1,18,	103:18 104:1,	41:17 43:2	73:14
19,20 24:14	9,10,17	116:17	<b>input</b> 147:23
25:11 26:2,16	105:21,23	<b>include</b> 68:17	<b>inputs</b> 74:6
27:3 28:6,7,	106:5,16	72:14	<b>insight</b> 84:4
8,12 29:23	107:17 108:20	<b>incorrect</b>	<b>instance</b>
30:1,13,22	109:13 112:6,	40:16,18	54:15 137:24
31:13,14,18	7,21 116:22	93:16	<b>instances</b>
32:4,6,22	117:6,12,22	<b>independent</b>	127:25 137:10
33:4,22,23	118:6 119:4,7	54:2	144:2 148:10
34:6,8,18,21	120:5,14	<b>indicated</b>	<b>instead</b> 31:16
35:8,11,12,	123:13,16,18,	76:20	142:20
13,14 36:9	25 124:8	<b>indicates</b>	<b>instructed</b>
37:10,15	125:22 126:5,	46:17	24:12
38:17,22	7,8,9,23	<b>Indicating</b>	<b>instruction</b>
39:1,12,14,	130:9,21	29:24 69:21	24:13
16,18 41:10	131:8,12	<b>individual</b>	<b>intentionally</b>
43:22,25 44:2	132:15	57:24 85:2	156:3
46:13,20	133:14,19	<b>individual's</b>	<b>intern</b> 14:12
47:1,2,8,9,19	134:25 135:1,	126:25	15:8 18:23
48:21,22	23 136:22	<b>individually</b>	19:3,8,10
49:1,5,18,23,	137:1,23	58:20	20:15 32:21
25 50:4,18,	138:5,15,18,	<b>individuals</b>	42:2 45:7,10,
21,23 51:25	20,22 141:7,	58:4 72:7	11 47:15
52:9,23 53:15	10 142:3,15,	120:12	50:5,6 52:13
55:10 56:11	18,20,23	<b>infected</b>	54:19 72:17
58:16,17	143:3,15	97:11,13	74:6 85:19
59:1,3,10,19,	144:1,3,5,13,	118:11	96:2 108:6
24 61:4,10	22,24,25	<b>infection</b>	113:20 127:6,
62:20,25	145:8,15,17	92:6 97:18,22	8 143:3,13
63:4,17,21,24	146:9,14	98:1 118:13,	149:19 152:4,
65:18 66:3	147:9 148:4,	16,17	18 153:1
67:25 68:3	22,25 149:2,	<b>inform</b> 151:22	<b>intern's</b>
69:4 71:9,19	9,19,20,23,24	<b>information</b>	115:15,23,25
72:2,12,17	150:11,22	51:6 58:13	151:17
73:5,6 75:8,	151:14 152:9,	72:5 76:25	<b>internal</b>
15 76:5,13	11,12,15	77:2 113:7,9,	134:18
77:3,11 78:5,	153:7 154:15,	22,24 132:16	<b>interns</b> 14:11
6,13 79:1,4	19 155:12,16		
80:7,19 81:7,			



November 18, 2020

23

15:3 16:11,24 26:4 32:19 48:2 50:5,10 52:9,16 54:16 58:15 59:2,3 63:12 68:15 71:12 73:15 105:24 106:10 108:3 112:23 113:14 137:10,14 153:10 <b>interplay</b> 116:6 <b>into</b> 15:13 19:21 23:18 26:2 32:10 60:22 61:4,8 62:13 63:15, 19 64:4 73:8 74:6 75:12 77:18 78:16 90:16 111:11 114:3 115:7, 20 119:2 126:25 133:7 135:16 144:13 145:2 148:6 151:21 <b>investigate</b> 32:10 102:17 <b>investigated</b> 117:5 <b>investigation</b> 59:4 117:2 131:19 <b>involved</b> 27:11 89:12 111:3,4 114:24 <b>is</b> 5:3,18,21 7:7 8:9 9:20 11:11,17 12:2,4 13:17 15:20 16:1 17:3,19,23 18:1,19,20,21 19:2,24 20:1, 17,18,19	21:1,8,25 24:13 25:6,8, 9,15,23 26:24 27:12,22 29:4,7,13,22 31:10,12 36:3,15,22 37:4 38:18 39:6,10 40:13 41:25 42:6,8, 10,11,14,25 43:20,21,23 44:8,20,21,23 45:3,9 47:8, 22 48:7 49:12 50:2,9,21 51:12 52:6,15 54:8 58:22 59:11 61:14, 19,25 62:18 63:22 64:6,9, 12,14,21,22 65:8,12 66:4, 14,23 67:8, 16,18 70:9, 10,11,13 72:16 73:10 74:7,19,20,25 75:1,6,16,22 76:9,11 77:4, 9,16,19 78:6, 8,24 79:4,8, 22 80:2 81:18,25 82:1,10,25 83:2,18,25 84:7,18 87:1, 9,10,19 88:5, 19 89:3,24 90:1,23 91:25 92:4,5,22,23, 24 93:1,16,25 94:4,16,18 95:15 96:1 97:8,11,22 98:19 99:13, 21 100:24 101:2 102:11, 18,20 105:7,	9,11 106:11 108:25 109:7 111:2,3,11 112:22 114:6, 7,9,20 115:9, 14 116:8,15, 22 118:24,25 119:20,21,23, 24 120:22,23 121:12 124:22 126:10 127:15 131:4,5,12, 18,21 133:5, 9,16,18 134:1,3,10, 16,17 135:10, 17 136:17,19 137:6,7,15,17 138:14,16,24 141:3,8,14 142:2,9,13, 14,15 143:6, 7,8 146:3,7, 12,16 148:1 150:18,23 151:7,11 152:25 153:16 154:24 155:4, 8,25 156:9 <b>isn't</b> 143:24 145:5 <b>issue</b> 49:12 50:8 52:19 54:25 113:15 130:3,4 132:11 138:24 153:25 154:6 <b>issues</b> 54:6, 16,19 55:1,7 155:25 <b>it</b> 6:2,10,24, 25 7:4,11,18 8:5 9:22 11:24 13:17 15:12,13 17:22 18:1, 14,19,21 19:15,24 20:3,9,14,17,	18 22:9,10, 11,14,19,20 23:1,22 24:17,21,25 25:5,12 26:15 27:2 29:7,11, 21,22 30:1, 12,16,19 31:2,5,19 32:2,7,9,13, 24 33:2,4,7, 8,12 34:5,11, 13,14,21,23, 25 35:8,9,10, 12,13,14,23 36:5 37:10, 11,14,17,19 39:2,15,21 40:13,14 41:11,18,20, 24,25 42:5, 10,17,18,24 43:3,12 44:17 46:14,18,21 47:9,10,24 48:11,21 49:5,17 50:3, 6,9,11 51:7, 18 52:3,7,10, 15,19 54:8,24 56:14,25 57:5,7,13,14, 18,20 58:17, 25 59:13 61:23 62:3 63:13,14 64:16,18 65:6,8 66:15, 16 67:7,12, 13,18,22,24 68:3,11,21 69:12,18 70:4,12,19 71:25 73:13 74:6,13,16, 17,19,20,23 75:6,9,23 76:11,19,21 77:11,17
--	---	--	---

November 18, 2020

24

78:9,10,12,  
21,25 79:4,6,  
9,17,23 80:2,  
4,6 81:2,8,  
18,20,21  
82:3,5,10  
83:14,16,18  
84:1,2,3,14  
85:4,8 87:6,  
10,20 88:7,8,  
10,11,20  
89:5,20 90:4,  
10,11,14  
91:1,7,22  
92:5,10,21  
94:12,14,17  
95:20 96:6  
97:13,14,25  
98:8,16,19  
99:3,11,12,  
13,16,20  
100:12,13,15,  
25 101:8,10,  
13,24 102:13,  
14,18,19,20,  
22 103:3,8,  
13,20,22,24,  
25 104:3,7,  
21,24 105:2,  
3,4,5,8,25  
106:5,8,21  
107:5,14  
108:8,9,11  
109:2,6,13,  
19,23 110:1,  
11 111:8,9  
112:1,9,12,25  
114:5,9,19  
115:9,10,14  
116:5,8,10  
117:23 118:3,  
4,5,6 119:1,  
12,14,15,19,  
21 122:8,10,  
14,21 123:7,  
8,9,12,13,16  
124:12,14,24  
125:1,11,15  
126:10 127:15

128:16,22  
130:2,14,22  
131:7,8,15,25  
132:1,4,5,6,  
8,9,12,13,14,  
17 133:3,9,13  
134:3,4,5,9,  
10,12,13,14,  
16,17,21,25  
135:2,10,18  
136:2,3,4,6,  
13,21 137:3,  
6,16,18,19,25  
138:7,15,18,  
23,25 139:16,  
18,19,20  
140:4,17,22,  
24,25 141:8,  
10,11,17,22  
142:4,5,13,  
17,23 143:6,  
10 144:7,8  
145:24,25  
146:5,18,21  
147:1,11  
148:2,4,5,10  
149:2,5,6  
150:15 151:3,  
7,14,21,22,24  
153:9,10,11,  
13,20 154:1,5  
156:6  
**it's** 6:9,11  
7:10 17:1  
18:16 20:20  
27:15 29:3  
32:19 33:10,  
13 38:19 44:5  
48:4 56:4,13,  
14 61:11  
62:24 64:16  
66:16 67:19  
70:10 74:10  
77:21 80:5  
82:8,12 92:5,  
9 94:13 99:6,  
7,11 104:25  
106:21 108:8  
115:15,23,25

116:1,3,9  
118:13 119:1,  
7,21 123:20  
124:24 126:1  
129:21  
131:19,21  
133:22 134:19  
135:9,21  
136:14 142:11  
146:4 149:19,  
23 152:10  
153:11 155:15  
156:2  
**items** 90:24  
**its** 149:5  
**itself** 56:15  

---

**J**

---

**Jack** 44:3,4,  
8,12,13,15  
**Jackson** 10:23  
16:2  
**January** 22:1,  
15,16 27:5  
117:11 120:5  
122:18 130:6  
140:19,25  
145:9  
**job** 13:2 93:7  
115:15  
149:19,23  
**Joe** 9:6 22:7  
23:13 24:2,4  
25:16 26:9  
27:19,24  
28:9,15 29:7,  
21 31:22  
34:17 35:16  
36:4 37:18,25  
41:22 42:12  
43:3,16,17  
45:7,14,25  
46:14,18  
50:18,22,24  
52:20 53:16  
54:7 55:1,4  
56:10,24 57:8

58:9 59:5,15  
60:4,8,11  
67:4 71:16  
87:21 94:9,15  
98:10,16  
101:2 103:10  
107:16,18  
109:4 112:6,7  
113:16 117:20  
118:3 119:17  
123:12,19,24  
125:20 126:2  
127:2,5,11,  
13,19,21  
129:23 147:3,  
5,7,12 148:18  
**Joe's** 34:8  
41:15 83:8  
**jog** 106:15  
**John** 18:16  
**joking** 39:22  
**judge** 12:18  
**July** 11:25  
39:7  
**jump** 7:1  
**jumping** 53:2  
147:16  
**jury** 12:18  
**just** 6:18,23  
7:4,6,7,9,13  
12:8,11,21  
15:4,6,24  
16:9,15,16  
17:13 18:13,  
15 20:10,19  
22:10 23:24  
24:7,21 25:9  
26:21,23,25  
27:10 28:24  
29:12,21  
30:25 32:6,13  
33:3,4 36:22  
41:7 42:8,24  
46:4,11 47:2  
48:6 50:2,4  
52:19 53:1,5,  
21 54:4,14  
55:24,25



November 18, 2020

25

59:16,22,24 60:20 61:20 62:3,9,11 63:1,5 64:23 75:1 76:10 77:6 80:18 81:19 82:12 83:13 85:4 87:10,11 89:21 90:8,15 91:15,25 93:8,19 94:3, 24 95:24 96:21 98:3,24 100:9 102:3 103:2,9,13 104:21 105:25 107:14,19 108:11 109:14 117:6 118:15 119:14,15 121:8 122:15 123:11,13 126:3,12 127:2,5 128:1,2,16 130:14 131:10,16,20 132:11 133:9 134:1 135:10, 21 138:9,10 140:12 144:7, 16,25 145:23 146:4,19 147:11 148:7, 15 152:6	<b>keyboard</b> 81:20 <b>kids</b> 10:6 <b>kind</b> 6:9 10:15 13:12 14:4 15:12 18:13 21:4 25:15 29:11 33:3 39:9 47:22 51:7,16 53:2 57:19,24 58:12,23 61:23 63:14 69:10 71:1 74:10 75:2 76:25 78:23 79:25 81:6 82:11 83:13 90:10,15 98:24 99:23 100:24 106:14 108:18 110:15,23 111:17 116:8 117:3 124:10, 17 126:23 130:18 135:12 140:13 142:11,14,15 <b>Kisha</b> 69:24 89:1 95:15,24 97:7 98:5 114:25 123:3 <b>knew</b> 38:17 47:24 103:5 106:6 110:10 121:2,15,20 133:3 154:5 <b>knife</b> 16:3 <b>know</b> 6:18,22 7:7,12,17 8:6 9:24 15:15 16:14 19:4 22:17 23:25 24:16 25:5, 10,13 27:2 28:7,10 30:12 31:21 32:7,22 33:6,11,14,25	34:16 35:10 36:19,21 37:24 38:1,3, 19,20,21 41:1,24 43:6, 10,11 44:2,4, 10,12 46:14, 25 49:3 50:24 51:5 52:11 55:14,15 57:18 58:9 60:1,19,20, 21,24 61:9,10 62:7,14 64:8 66:16 67:15 68:20,22 69:24 71:16 73:16,20,22 74:25 75:3 76:22 78:19 81:5,9,19 82:25 87:2 89:13,15 92:15,23 93:1,3 97:10 98:4 99:6 102:24 103:5, 8 104:12 105:9,25 107:18,20,21 108:2,7,18 109:6,12,13 110:23 111:24 112:11 113:21,23 114:1,22 115:19 116:16,25 117:9 119:16, 17 121:5,9, 14,15,17 122:9,15 123:10 124:3 126:5,7 127:1,22 128:11 129:25 130:9 131:22 132:2,6,7,21 133:5,8,20,23	134:1,3,8,13 135:21,25 136:2,23 137:14,17,20, 21 138:4,16 139:2,3,4 140:22 142:6, 22 143:10 144:4,9,10 146:22,25 147:16 149:23 151:1 152:11 154:3,10,12, 13 155:11 156:11 <b>knowing</b> 47:19 103:3 <b>knowledge</b> 96:14 97:10 111:1 116:24 140:8 146:18 147:9 <b>knowledgeable</b> 75:5 <b>known</b> 91:14 100:5 121:12 132:25 <b>Kutcher</b> 74:20,25 75:4,22 76:9, 14 79:9 80:9, 16 81:2,14,25 83:17 84:5 92:17 94:5 106:14 151:11 <b>Kutcher's</b> 93:16 113:4
<b>K</b>			<b>L</b>
<b>keep</b> 51:7 72:5 134:19 <b>keeping</b> 50:1 144:11 <b>Keith</b> 106:18, 22,23 <b>Kelly</b> 44:3,4, 7,12 67:8 <b>kept</b> 135:19, 21,23 144:9			<b>lab</b> 32:7 <b>labs</b> 17:5 <b>lack</b> 66:8 <b>language</b> 80:1,3 81:6 86:13 <b>large</b> 25:23 44:22 104:7

November 18, 2020

26

<b>larger</b> 110:17	<b>let</b> 6:24 7:16	32:18 33:21	156:18
<b>last</b> 8:15,17, 18 50:3 51:15 81:1 85:5,7 96:15 145:11	15:10 19:17 25:5,10 28:10 35:22 36:20 37:10 42:5 49:3 53:2,14 55:15 68:8,20 80:13 99:4 112:11 119:17 122:12 143:14 149:23 150:25	36:3,5 37:10 38:15 39:4 40:2,22 42:18 43:12 47:11 48:1 49:4,25 51:14,19 53:24 54:22 55:24 56:1 57:23 59:22 61:4 63:16,25 65:23 66:15, 16 67:7,12 69:14,18 70:4,15,25 72:1 73:2,17, 24 74:19 77:11,17 78:15 79:9 80:9 81:20 82:6,8 85:18 87:6 88:7,10 90:3 95:6,10, 11 98:15 99:7,20 100:10 101:1, 10,13 102:19, 22 104:9 105:8 106:21 108:2,6,8,16 109:4 113:7 114:20 115:11 116:5 118:14 120:11 122:7, 14,25 124:23 126:18 128:23 129:15 130:2, 12 131:4,5,19 132:10 133:19 134:16,17,20, 22 135:24 136:4 138:11 139:23 140:25 142:4,5 144:8,10,16 146:6,23,24 147:15,17,22 148:11 149:6 153:11 154:9	<b>liked</b> 137:25 <b>limit</b> 140:4 <b>line</b> 14:1 62:1 67:25 <b>link</b> 81:20 <b>linked</b> 76:6 80:19 <b>list</b> 17:3,13 18:7,20 59:1, 3 73:12 99:21 100:4 120:11 131:12 133:10,13,21 134:5,9,12, 16,17,24 141:16 144:7 <b>listed</b> 45:9 54:9 97:14 <b>listened</b> 54:23 <b>listening</b> 28:9 <b>lists</b> 131:13, 17 <b>literally</b> 49:13 61:6 <b>little</b> 7:4 18:1 34:3 42:5,6 46:10 50:13 61:4 66:16 69:23 75:15,23 77:1 80:14,16,25 86:12 116:6 131:9 134:6 143:15 144:15 <b>live</b> 5:13 <b>lived</b> 5:16 <b>lives</b> 55:8 <b>lodge</b> 122:18 <b>log</b> 51:12,17 <b>logged</b> 50:3, 18,25 51:3,9 52:6 145:14, 16,18 146:9
<b>late</b> 46:10 59:22 87:2,11 119:7	<b>let's</b> 21:15 49:18 53:1,13 96:18 103:23, 25 108:9 128:2 141:18		
<b>later</b> 40:5 50:17 73:7 82:17 88:11, 21 101:12 119:13 138:8 145:16 148:4	<b>letter</b> 140:16 141:10,14		
<b>latter</b> 15:12	<b>letting</b> 7:3		
<b>lawyers</b> 6:17	<b>level</b> 12:9 14:9 16:2,25 19:2 25:6 62:9 76:18,19 153:11		
<b>lay</b> 62:22 72:12	<b>levels</b> 153:14		
<b>laying</b> 23:20 62:3	<b>liar</b> 31:13		
<b>layman's</b> 90:17	<b>lie</b> 33:7 38:7 118:5,6 137:7		
<b>laypersons</b> 12:22	<b>lied</b> 22:8 23:13,15,17 31:16,22 102:3 108:16 118:4 119:17 123:12 130:4 137:2,5,6 138:24		
<b>lead</b> 60:11	<b>lies</b> 32:22		
<b>learned</b> 75:5 133:2	<b>life</b> 81:18 145:1		
<b>learning</b> 131:24 139:9	<b>lift</b> 61:20 63:10		
<b>least</b> 54:5 59:2 72:8 97:2,24 134:4 143:9	<b>like</b> 6:7,12, 17 12:13 16:21 17:25 18:16 19:17 25:12 28:1,20 29:11,20,23 30:2 31:3		
<b>leave</b> 28:7 33:23 37:20 59:13			
<b>leaving</b> 38:8 40:7 141:24 143:1 150:17			
<b>led</b> 117:11			
<b>left</b> 42:11 47:19 49:4 142:1,21 144:14			
<b>legally</b> 153:6			
<b>less</b> 42:18 155:14			

November 18, 2020

27

<b>logging</b> 49:19,22 50:6,15 52:17,22 145:3,6 146:1,6 <b>long</b> 5:16 7:18 8:17 10:2 23:20 29:3 36:6 50:3 83:14 91:7 96:19 123:20 124:24 126:1 129:21 <b>longer</b> 15:7 24:3 144:11 <b>look</b> 23:23 24:12 25:2 26:3 28:4 32:10,24 33:7 61:10,13,15, 18,20,22 62:11,12 63:13,16,21 65:23 67:9 70:25 71:4 76:21 83:13, 23 92:11 99:3,4,11,12, 16 100:12 105:3,4 108:8 112:10,12,25 113:1,13,20 115:11,15 127:2 128:15 131:10,22 135:13 137:18,19 138:1 152:9, 11,15,20,21, 22 154:22 <b>looked</b> 9:5, 11,18 30:8 31:25 59:10 60:21 98:12 100:16 106:8 114:2,3 117:12 122:17 129:22,25	137:16 138:5, 18 149:6 <b>looking</b> 37:25 41:10 59:9 61:19 73:9, 10,22 81:1 90:9 93:9 106:15 109:7 117:5,23 148:18 152:23 <b>looks</b> 29:20, 22 30:2 36:3, 5 37:10 42:17 43:12 66:15, 16 67:7,12 69:18 70:4 73:24 77:11, 17 79:9 80:13,16 87:6 88:7,10,20 96:3 98:15 99:20 101:1, 10,13 102:19, 22 105:8 114:20 140:25 <b>lot</b> 13:23 32:20 39:9 48:21 53:23 54:5 71:2 75:5 83:20 103:21 141:9 148:17 <b>loud</b> 48:7 <b>lounge</b> 48:22 49:1 99:20 141:24 142:10,14,18 143:1 <b>lower</b> 13:9 69:23 <b>lower-level</b> 17:8 <b>Luckily</b> 10:13 <b>lying</b> 30:20, 21,23 31:7, 12,18 32:18 33:1 102:12 107:23,24	108:13,14 109:5 114:7 132:11 137:25 138:23 156:3 <hr/> <b>M</b> <hr/> <b>M&amp;m</b> 119:21 120:1,6,9,14, 20 130:24 131:12,21 133:9,14 134:2,4,12, 14,16 135:1, 4,20,25 136:4,11 <b>made</b> 67:8 99:16 105:3 116:10 130:1 147:7 <b>Mahoney</b> 5:5, 10,12,14 21:23 45:18 53:11 128:8 152:4 156:21 <b>main</b> 134:25 <b>majored</b> 10:20 <b>majority</b> 143:12 <b>make</b> 7:9 12:11,22 23:4,24 30:11 42:5 49:25 55:8 63:13 65:15 66:2 70:20 82:15 83:19,23 93:8,20 95:8 101:17 102:3 107:20 130:5 131:16 133:13 140:18 145:23 147:17 154:2 <b>makes</b> 66:1 118:17 153:24 <b>making</b> 21:4 41:8 46:2 64:15 104:14	154:4,23 <b>male</b> 123:22 124:1 153:24 154:4 <b>man</b> 10:10 <b>management</b> 132:3,20 133:1,7,11 136:3 <b>management-</b> <b>type</b> 132:1 <b>manipulate</b> 140:17 <b>many</b> 8:11 10:6 44:23,24 49:24 52:23 54:15 72:1 105:20 119:19 153:8 155:10 <b>Mario</b> 92:22 <b>mark</b> 21:18 29:15 35:20 37:3 82:16 <b>MARKED</b> 21:20 29:17 35:25 37:7 42:21 66:20 69:7 74:2 75:19 79:11 80:22 82:21 84:20 86:4,22 87:4, 24 88:23 98:21 101:5 105:14 <b>marking</b> 62:5 87:18 <b>married</b> 9:25 10:2 <b>matter</b> 20:9 41:16 <b>may</b> 7:4 12:17 19:16 24:3 28:16 34:21 38:15 46:20 55:21 56:21 57:5 85:19,23 89:25 91:16 97:15 99:25
--	--	---	--

November 18, 2020

28

100:20	113:14,22	17,18 91:20	<b>memorized</b>
106:16,18	114:7,16	109:2	48:20 81:19
108:5,23	115:22 116:2	<b>meant</b> 46:22	<b>memory</b> 21:8
109:24 110:10	118:4 122:12	61:15 137:13	22:17 26:24
112:1 119:15	123:12,16	<b>med</b> 24:25	27:12 30:9
122:10 124:14	125:3,10	25:1 57:8,25	35:1 54:2
129:16 132:25	128:21 129:4	58:1,5,6,11,	93:25 106:16
134:7,8	130:3,24	14,25 73:14	107:8 118:10
143:14 156:8	133:3,13	96:23 123:22,	119:8,11
<b>maybe</b> 18:9	134:14	23 124:1,3,6	126:2 129:6
22:18 44:8	137:23,24	129:14	141:7,14
87:15 107:23	138:3,23,24	146:12,15	146:23 148:1
138:9	143:9,14	147:8 154:20	<b>mental</b> 61:9
<b>MD</b> 5:5 68:21	145:25 146:3,	<b>medical</b> 7:12	<b>mention</b>
156:21	5 147:2	9:1,4,15	103:13 146:15
<b>MD/NP</b> 68:4	152:9,10,12,	10:22 11:9	154:19
<b>me</b> 6:24 7:1,	17 153:7	39:17 40:21	<b>mentioned</b>
11,16,19 8:24	<b>Meagan</b> 5:5,12	57:11 66:13,	30:21 149:1
12:6 14:5	138:3 156:21	14 91:23	<b>mentioning</b>
15:10 17:3	<b>mean</b> 12:6,12	152:18 153:18	26:9
19:17 20:17	14:12 15:25	155:9	<b>message</b> 29:20
22:8,9 23:8	24:19 28:22	<b>medication</b>	30:1 36:4
25:5,10 26:4	30:11 31:16	7:25	37:4 38:16
28:24 30:22	32:3 36:12	<b>medicine</b>	39:21 43:22
31:6,18 33:6	42:17 46:7,8,	62:25 155:4,	46:20,22
35:22 38:8,23	20 47:14	6,8,15	47:1,8,9 56:2
40:2 41:22,23	48:11 49:22	<b>MEDIHONEY</b>	96:15 98:15,
42:1,5 44:15	51:21 56:2	70:21	24 100:25
45:13 47:11	59:10,14,21	<b>meet</b> 17:2,3,	101:10 102:24
48:7 51:1	61:6 64:11,19	12 26:17	<b>messages</b>
52:21 53:3,	67:12 68:7,	51:22 52:1	9:11,17 40:21
14,23 54:6	22,23 70:8	148:7	41:2,22
55:7 57:19,21	71:4 72:10	<b>meeting</b> 6:1	129:23 130:1,
58:13 59:7	77:25 79:19,	9:12 27:13	5
60:20 61:6	20 87:3 90:13	41:3,5 51:17	<b>met</b> 5:18 21:9
63:12,24	91:19 94:7,	101:13 124:15	113:5,6,16
64:25 68:24	13,24 107:25	129:17 132:1	<b>Microlab</b> 91:2
72:4,5 79:22	109:25 116:21	<b>meetings</b>	<b>mid</b> 16:25
80:13 81:11	121:1,2	26:6,9,14	19:7,9,12
82:1 83:16	122:11 130:20	51:18,20,22	67:3
93:3 95:11	132:9 138:20	52:8 130:24	<b>middle</b> 14:9
96:15 97:9	148:14	<b>member</b> 29:9	106:22 142:15
98:10 99:4,8	153:17,25	49:2 71:11	<b>Midtown</b> 11:16
100:14 101:16	<b>meaning</b> 13:22	<b>members</b> 19:7	<b>might</b> 12:21
102:3,10,12	37:21 65:13	<b>memories</b>	51:8 56:2
103:4 104:8,	<b>means</b> 12:8	27:16 38:4	91:24 123:8
15 107:24	15:4 46:10	107:9 109:14	128:1 152:1
108:24 109:5	66:5 68:24		
112:8,11,25	84:19 90:14,		

November 18, 2020

29

<b>military</b> 19:15,16	138:6	97:2,6 98:23	87:7,21 88:1,
<b>mind</b> 26:16	<b>month</b> 13:6	101:7 105:16	25 92:20,24
27:3 46:2	14:23 15:18	112:18 114:15	93:1,2,4,5,
103:18 112:6,	16:8,9,18,24	125:17 128:1,	12,13 95:4,5,
7	27:24 32:1	7 140:2,11	6,11,13,14
<b>mine</b> 10:13	34:13 57:20	151:25 152:3	96:17,18,21,
<b>minor</b> 25:12,	69:10 115:15	156:12,14	24,25 97:2,6
13 33:13	124:16 130:25	<b>morning</b> 8:20	98:23 99:15
36:22	143:20 145:4	18:7,17,20	100:4 101:7
<b>minute</b> 84:16	<b>monthly</b> 52:3	59:3 72:17,24	102:4 105:16
<b>minutes</b> 8:21	<b>months</b> 10:9	73:6 75:8	112:17,18
88:11 95:8,12	15:13,16,18	83:18 88:12	114:13,15
97:3 128:2	69:12,13,16	91:13 96:2,3	123:3 125:16,
139:23	120:7	100:9 101:1,	17 128:1,4,7
<b>missed</b> 33:14	<b>morbid</b> 23:22	20 102:9,19,	140:1,2,7,11,
153:10	<b>morbidities</b>	23 104:1,9	12,15 151:24,
<b>Mississippi</b>	119:23,24	105:7,23	25 152:1,3
10:19,23	<b>morbidity</b>	109:10 151:3	153:19 155:22
11:18 152:18	119:20 135:17	<b>mornings</b>	156:12,13,14,
<b>misunderstandi</b>	<b>more</b> 14:2	131:1,2	17,18
<b>ng</b> 49:16	24:25 27:10	<b>mortality</b>	<b>MRN</b> 134:12
<b>MMATTEST</b>	40:1 47:14	119:20	<b>Ms</b> 111:22
82:1,3	50:11,14	<b>most</b> 10:16	<b>much</b> 31:10,12
<b>molecular</b>	54:25 55:8,24	24:15 25:12	42:4 64:17
10:21	61:4,14 73:8	72:20 77:13	132:13 136:5
<b>moment</b> 5:18	98:13 99:4	<b>mostly</b> 13:21	137:13 142:8
35:11 104:6	108:13 119:15	75:15 130:2	<b>multiple</b>
115:5 136:14,	134:13 136:5	132:11 145:24	98:13
17,20,23	141:14	<b>mouse</b> 29:23	<b>must</b> 43:7
137:7	145:13,23	<b>mouth</b> 61:10	46:2 127:23
<b>moments</b> 104:5	146:2,21	<b>move</b> 47:25	139:20 142:4
108:6	147:1 148:7	61:11	<b>my</b> 5:18 6:23
<b>Monday</b> 17:19,	149:25 152:25	<b>moved</b> 11:13	9:11 11:2,24
22 19:19	155:14 156:12	<b>moving</b> 29:24	12:16 20:17
22:20 43:12	<b>Morgan</b> 5:9,19	<b>Mr</b> 5:9 8:7,8	22:7 23:19
114:5 116:14	21:15,18,22	21:15,18,22	26:16 27:3,12
137:22,25	29:19 35:20,	29:19 35:20,	29:22,23
149:9,14	24 36:2 37:9	24 36:2 37:9	30:17 35:22
<b>Mondays</b> 26:16	42:23 45:17	42:23 45:16,	38:4 40:9,16,
103:15 107:13	52:25 53:5,10	17 52:25	18 41:7 44:1
112:11 117:19	56:18 66:22	53:5,10	46:2 51:2,16,
150:12	67:14 69:9	56:16,18	17 53:2 59:18
<b>monitor</b> 50:2	74:4 75:21	66:22 67:11,	71:5,25 73:4
68:4,8,11	79:13 80:24	14 69:9 74:4	78:13 81:12
70:23	82:23 84:22	75:21 79:13	84:1 96:14
<b>monitoring</b>	86:6,24 87:7	80:24 82:23	101:25 103:18
13:15 68:12	88:1,25 93:1,	83:8 84:10,22	105:3 111:1,
	4,12 95:5,11,	86:6,14,24	19 112:7,21
	14 96:18,24		116:10 117:22

--	--	--	--

[REDACTED]



November 18, 2020

31

20,24 48:10 49:2,22 50:6, 18,25 52:9 54:10,14 55:21,23 57:8 58:9 59:16, 19,22,24 60:1,3,4,8, 11,17,21 62:4,24 63:18 66:10 68:9 70:11 71:25 72:3 73:1,21, 22 74:17 76:19,21 77:21 78:17, 22 79:3 84:6 85:4,15 87:12,15,16 88:14 90:6 91:17 92:7 93:3,19 96:13,21 97:11 98:7 99:7,11 101:20 102:11,15,21 103:4,8,11, 13,19 104:12, 15 105:17 107:1,12,15, 16 108:1,8,23 109:7 112:7, 8,24 113:13, 17,21 115:20, 25 116:1,3,9, 25 117:21 120:19 121:8, 11 122:1,5,9, 10 123:1 125:11,13,15, 19 126:7,11, 12,14,16,17 127:20 131:20,21 132:4,16,25 133:2 134:7,8 136:5 137:1, 12,18,20,21	138:23 139:25 140:6,10 142:3 145:16, 18 146:4,6,9 147:4,12 149:1 152:10, 19,23,24 153:20,24 154:7 156:2,8 <b>note</b> 9:5,6,7 23:7,8 59:13 73:24 74:6, 19,22 75:22 76:6 77:18 78:3,19,23 79:21,23 80:9,19 81:23 82:2,18 83:8, 9,14,21 84:13 86:11,18 88:5,10 89:1, 7 90:17 91:12 92:11,17 93:16 94:4, 10,22 95:16, 23,24,25 96:6,22 97:8, 14 99:16 104:13 105:3, 7,17 106:11, 15 114:3,10 117:8 127:1 146:14 148:23 149:10 151:21,22 <b>noted</b> 148:24 149:4 <b>notes</b> 9:7 13:23 71:19 74:13 77:11 78:15,18,21 80:7,14 81:10,12 83:19,23 88:15 89:20 94:4,16 96:3 98:13 111:6 114:2 115:7, 16 117:7	126:23 134:20 135:19 138:12 148:18,22 149:20,24 152:23 <b>nothing</b> 18:12,15,17 23:25 24:7,8 31:21 56:12 78:5,10 92:4 99:25 137:23 149:4,13 <b>notice</b> 13:13 106:21 <b>noticed</b> 65:4 109:9,23 114:12 115:12 128:25 147:21 <b>notification</b> 74:15 <b>notified</b> 37:23 90:21 <b>notify</b> 68:4, 11,21 <b>notifying</b> 68:12 <b>noting</b> 97:25 138:13 <b>November</b> 66:14 67:3 69:4 110:16 114:10 <b>now</b> 6:10,11 7:21 11:12 18:12,22 30:11 37:24 38:10 39:12 44:2 45:9 48:6 54:11 60:16 63:7 73:24 76:25 79:22 81:23 82:24 85:18 88:2,19 89:5 90:10 99:10, 12 100:9,12 106:11 110:16 111:5 123:21	124:18 141:14 147:16 148:16 155:22 <b>number</b> 28:15, 17 29:5,16 30:2,9 31:17 33:1,16,25 35:21 41:9, 12,24 46:16, 17 48:10,21 49:18 53:15 57:7 134:12 140:18 141:15 143:16 145:3 146:11 <b>numbered</b> 28:18 <b>numbering</b> 27:20,22 28:5,12 30:5 34:9 35:4 127:10 <b>numbers</b> 30:24 31:3 34:2 48:19 56:6 <b>nurse</b> 54:12 55:15,17,21 56:1 64:20, 21,22 65:1,6, 12 67:7 68:8, 10 70:20 77:14 89:2,15 90:3 97:8 105:12,19,20 106:7,19 109:21 110:10,13,14 111:22,23 112:14 114:10 115:1 122:9 123:3 151:20 <b>nurses</b> 24:23 26:1 53:16, 20,21,22,23 54:5,6,16,20, 22 55:2 56:11,19,20, 21,24 57:4 65:3,8,9,15
---	--	--	--

November 18, 2020

32

68:13 89:8,13 109:15,21 110:5,7,9,11, 19,23 111:14, 20 112:1 115:6 117:25 121:4,12,14, 17 122:8 129:14 <b>nursing</b> 114:24 <b>nutshell</b> 13:2	8:6,15 9:6,17 10:15,23 11:2 12:9,15,16 13:1,12,15, 23,24 14:4,5, 6,7,16,19,21 15:12,13 16:12,15,19 18:13,22,25 19:1,2,7,25 20:10,11,13, 17,18,24 21:3,4,11 22:1,15,22 23:18,21 24:4,15 25:6, 12,15,16,20 26:1,15,24 27:3,12,15,24 28:6,12,17, 19,20 29:9,11 30:5,9,18,20, 22,24 31:2, 16,25 32:20 33:3,20 34:6, 21,23 35:1,8, 12,14 36:23 37:17 38:4, 21,25 39:9, 10,16 40:3 41:15,17 42:4 44:21,22 46:8,12,19 47:5,23 48:1, 11,21 49:12 50:14,15 51:7,12,16 53:2,3,23 54:5,15,25 56:22,23 57:19,20,21, 24 58:12,22, 23 59:1,5 60:11 61:23, 24 62:2,9,13, 22,23 63:2,14 64:13,17 65:12,14,24 66:6,8,13,14	67:9,13,19,23 68:4,9,10,25 69:3,10 70:10,12,22 71:1,2,11 73:3 74:5,10, 14,15 75:2,10 76:25 77:6,11 78:23 79:25 81:6 82:2,6, 11 83:7,13,20 84:15,16 85:5 86:7 88:3,8, 20 89:12 90:10,15,16, 17 91:25 92:15 93:11 94:3,11 96:14 97:9,18,25 98:25 99:4,23 100:25 102:9, 19 104:4,13 105:7 106:5, 9,14,16 107:8,10 108:18 109:10,11,21, 25 110:1,15, 23 111:14,17 112:1,13 113:1,5,6,16, 19 114:1 115:15,19 116:8,12,17 117:1,3,21 118:10 119:4, 8 120:7,8,24 122:19 124:10,11,15, 17 125:3,6,21 126:11,22,23 127:5,18 128:25 129:6, 13,23,25 130:1,5,11,18 131:6,8,11 132:11,15 133:6,14 134:6,14	135:1,6,12, 14,17,19 136:8 137:21 140:4,8,13,16 141:7 142:11, 12,14,15,20 143:5,12,14, 15,17 144:7, 8,17 145:4,9, 14,24 146:23 147:3,14,22 148:1,17 149:17 150:13 151:22 152:17 153:8,16,20, 25 154:16 155:8,23 156:10,17,21 <b>off</b> 21:15,17 35:22 73:3 94:11 97:21 100:13,15 102:1 106:2,3 111:17 142:17 156:13,14,15 <b>offend</b> 7:11 <b>office</b> 50:19, 21,23 145:17 <b>often</b> 17:20 78:15 143:21 <b>oh</b> 10:10 24:10 71:5 100:8 108:11 124:21 131:2 138:1 <b>okay</b> 6:3,6 7:7,8,14,15, 20 8:4 9:1, 10,13,15 11:4,15 13:8 16:8,14 17:15 19:12 21:8 22:16,19 27:14 32:23 33:8 35:24 36:10,13 38:13 39:1 40:20 42:11, 25 44:10
<b>o</b>			
<b>object</b> 45:16 56:16 67:11 112:17 114:13 125:16 140:1, 7 <b>observation</b> 60:10 <b>obvious</b> 7:4 <b>obviously</b> 38:21 67:4 91:13,17 109:8 123:16 <b>occasionally</b> 36:16,19 65:3 105:19 108:3 <b>occur</b> 87:16 130:25 <b>occurred</b> 43:2 49:13 57:4 75:7 98:9 135:14 <b>occurrence</b> 50:10 70:13 <b>occurring</b> 27:12 42:17 48:2 <b>October</b> 11:13,14 <b>odd</b> 34:3 102:24 144:15 <b>of</b> 5:2 6:7,9, 16,18,23 7:21,23,25			



November 18, 2020

33

53:4,7,13 61:24 62:1 86:11 87:18 92:14,25 95:11 96:24 97:2 99:10,13 100:11 106:15 109:9 131:3 137:15 140:21 147:25 156:20 <b>old</b> 10:8,9 <b>on</b> 7:5,25 9:7 12:3,7,8,11, 23 13:6,16, 21,25 14:3,7, 22 15:17,18, 22 16:7 17:5, 6,23,24 18:23 19:5 20:2,3, 7,12 21:11,23 22:1,10,16 23:21 24:5,20 25:1 26:3,16 28:25 29:13 30:12 31:1 32:20 37:22, 24 38:4,15,20 39:7 40:15, 16,18 41:25 42:11 43:3,7, 8,12 44:17 45:1 47:25 52:16 53:2, 13,21 55:7,12 56:20,21,23 57:7 58:22,25 59:17 60:16 61:12,17 62:3,5,22 63:22 64:13, 16 65:4,11,14 67:13 69:4, 10,16,19 70:9 71:8,24 72:4, 5,12 73:1,13, 19 74:5,11,19 75:16 76:2 79:2 80:15 81:20,23 83:7	85:16,23 86:15 87:6,20 88:17,19 89:8,21 91:4, 10 94:13 95:17 96:15, 17,23 99:11, 17,19 100:4, 17 101:1 102:8,10 103:15,20 105:12,23 107:7,14 109:9 112:11, 23,25 113:4,8 114:1,4,25 115:6 116:14, 15,22 117:24 118:9,15 119:22 120:14,23 127:11 129:1 131:5 133:21 134:4,9,12, 17,19,23 135:18 138:7 140:13,16 141:15 142:11,14 143:11 144:16 145:3,9,23 147:23 148:5 149:5,9,13 150:8,16 151:3,15 155:10,17 <b>on-call</b> 155:8 <b>once</b> 23:24 28:7 95:25 119:15 125:14 126:5 130:25 140:7 <b>one</b> 7:18 8:20 10:7 12:18 13:1 14:25 15:2 16:15 18:17,20 20:19 21:15 24:16,25 26:1	27:19 28:20 30:18,20,22, 24 31:2,10 34:21 37:10, 23 39:16 41:15 44:21 45:6 51:6 57:21 58:22 66:1 73:7 75:16 79:8 80:13,16,17 81:1,24 82:17,24 84:8 85:19 86:25 88:2 89:25 90:8,9 94:3 98:13 99:9,11 100:18 101:2, 23,24 111:14, 16 116:20,21, 25 117:25 119:14 120:24 126:22 128:16 131:17 142:14 143:14 146:2 155:12,14 <b>one-on-one</b> 57:24 <b>ones</b> 29:1 89:10 121:17 <b>only</b> 21:1 28:19 41:21 45:19 46:19 47:1 52:23 63:12 73:3 121:23 122:21 123:25 124:8 126:13 128:13 131:18 <b>onto</b> 16:6 67:4 109:14 126:21 <b>open</b> 116:8 <b>open-ended</b> 139:24 <b>operating</b> 13:12 17:10 37:15 38:17, 18,22 66:3	72:3 76:23 142:12 <b>operation</b> 134:15 135:15 136:8 <b>operative</b> 9:7 <b>opinion</b> 112:21 117:22 136:22 137:6 138:22 <b>opportunity</b> 89:14 108:10, 17 131:24 <b>opposite</b> 58:23 148:17 <b>options</b> 65:22 66:9 <b>or</b> 5:24 6:12 7:6,10,25 10:3 12:18 14:16,21 15:1,13 16:15 17:1,10,19 18:13 19:7,13 20:10 22:13, 19,20,23 24:13,21 25:10 26:1,24 27:7 28:14 32:4,7 33:7, 20 35:8 36:22,24,25 37:17,22 39:13 40:7, 21,24 43:4,23 44:12 45:1,11 46:14,23 48:2,3,9 50:1 52:1,3,7 53:6 54:12 56:11, 25 57:17 58:1,17 59:4, 16,22 60:1, 17,21 62:4,5 63:10,19 64:3,18 65:3, 6,13 66:1 68:8 69:5,11 70:21 71:23
---	--	---	---

November 18, 2020

34

73:7,11,17,22 74:15,17 77:8 78:10 79:3 81:6,20 82:12 84:5 89:20 92:16 93:3, 11,18 94:15 95:2,8 97:11, 17,25 98:13 99:3 100:9,18 101:3 103:12 104:9,25 107:23 108:4, 9,18 111:3,15 113:21 115:21 116:8,17,25 117:2 118:14 119:18,23 120:5,11,19 121:4,15 122:10,19,24 123:18 125:1 126:2,11,16, 22 127:12 128:16 129:14,23 130:10,11 131:4,5,11,19 133:5,6 134:17,20 135:1,10,16, 17,23 137:2, 19 138:7,10 139:19,23 141:8 143:21 144:5,23 146:19 147:8, 15,18 152:5, 15,19 153:1, 12,25 154:10, 18 <b>order</b> 49:23, 25 75:15 89:16,22 90:4 114:12,17,18 <b>ordered</b> 89:5 90:21 114:11 <b>orders</b> 13:24 65:16 67:13	89:14 90:3 <b>orthopedic</b> 96:4 <b>ostomy</b> 64:24 118:23 136:9 <b>other</b> 6:6,21 9:10 13:9 15:15,21 16:14 19:7,8, 9 23:1 29:1 31:11,20 33:9 34:2 35:7,12 36:15,21,23 38:16 43:18 44:12 46:9 47:16 48:1 52:15 54:2,9, 16 56:7,8,9, 11,14 58:4,5, 6,23 70:16,24 72:6 77:22 93:6 96:5 106:2 107:9 109:21 112:1, 5,14,15,20 117:8 121:25 122:17,19 124:6 127:4, 6,8,10,13 128:16 129:14 131:18 134:24 137:10 140:5 145:14 <b>others</b> 34:6 35:8 45:15 87:21 137:10 <b>otherwise</b> 26:3 115:12 <b>our</b> 13:3,16 20:4 25:1 31:25 46:13 47:23 55:8,11 80:7 82:15 92:10 103:15, 16 105:5 109:17 113:1 119:21 125:23 129:25 130:5 132:22 134:4,	20 142:14 143:6,12 148:11 <b>out</b> 8:22,25 13:24 17:9,12 20:25 22:5 28:12 37:16 48:24 50:18, 25 51:3 53:3 56:15 61:25 64:7 65:16 78:1 81:8,20 88:2 96:22 102:15 107:22,23,25 108:4 109:1 115:14 116:18 117:23 124:17 128:19 131:6 139:6 141:19, 25 143:17 144:7,8,14, 17,19,20 145:5,16 146:9 153:20 <b>outline</b> 41:7 53:2 128:3 130:11 <b>outside</b> 27:2 64:3 <b>over</b> 17:13 18:13,23 19:18 24:23, 24 26:19,21 31:25 43:24 48:7 61:12 78:9 82:17 89:11 104:7, 11,14 107:8 116:14 118:9 133:17 141:5 155:24 <b>overall</b> 13:15 <b>overhead</b> 141:23 142:17,24 143:4 <b>overnight</b> 90:11,18,19,	21 107:15 117:22 <b>overruled</b> 66:8 <b>overseeing</b> 13:4 16:10 <b>own</b> 23:17 51:17 59:4 75:11 76:14 81:12,15 82:11,15 106:4 <hr/> <b>P</b> <hr/> <b>p.m.</b> 20:2,4 53:8,9 97:4,5 128:5,6 156:22 <b>PA</b> 44:17 <b>package</b> 144:1 <b>page</b> 12:12 39:10 120:23 <b>paggers</b> 36:6 <b>pain</b> 64:7 92:16 93:11 <b>paper</b> 22:10 <b>paperwork</b> 28:20 <b>Papin</b> 5:19 11:20,23 15:11 21:9 23:4 27:7 37:5 38:11 40:7 53:23 54:7,13 73:25 74:13 75:16 77:2 79:9 80:15 85:22 86:2 87:19 88:16 90:10 91:13 122:20 128:10 130:18 138:12 139:25 140:6 147:7 148:23 <b>Papin's</b> 9:6 74:22 77:8,10
---	--	---	---

November 18, 2020

35

126:23 148:18 149:10 151:21 <b>paragraph</b> 41:11 <b>pardon</b> 20:17 <b>parking</b> 126:18 <b>part</b> 14:6,21 16:15,19 38:25 40:16, 18 42:11 46:8 47:25 49:12 70:10 109:25 113:1,19 <b>particular</b> 14:9 24:10 26:13 41:3,10 78:3 137:23 <b>particularly</b> 32:19 <b>pass</b> 63:21 <b>passed</b> 131:5 <b>past</b> 107:13 <b>paste</b> 79:25 <b>pasted</b> 77:17 <b>patient</b> 9:6, 8,16 13:15, 22,23 17:4,25 18:6,12 20:25 23:10,13,18, 23 24:4,6,11 26:5,10,13 27:3 31:20 32:4,6 37:16, 22 46:15 47:5,16,19 49:3 58:17 59:11,14,25 60:5,8,12,13, 14,16,17,18, 19,23 61:12, 17 63:8,16, 24,25 64:1,2, 6,23 65:1 67:21 72:7, 11,13,16,21 73:13 76:2, 10,22 78:20,	25 79:3,16 80:10 81:3 84:17 85:10, 13,16,20,23 86:2,20 88:4, 17 89:11 90:1,6,14,20 91:3,10 92:6, 14,18,24 93:18,21,22, 25 94:6,8,20, 21,23 98:6 99:10 100:3, 12 101:21,22 102:20,21,23 103:5,7,11, 16,17,18 104:6,11,14, 20 107:2,3,8, 10,21 109:2, 5,22 111:4 112:22 113:5, 25 114:4,6, 20,22 116:1, 2,4,7,9,11, 16,18,23 117:3,14,18 118:9,18 119:8,18 120:1,6,20,24 121:3 123:3 124:11 129:5 130:4 131:11, 23 132:2,16 133:20,21 134:8 135:4, 13,25 136:5, 8,10,18,21,24 137:12 138:2, 5 144:6,9 148:19 150:4, 14 152:9,13 153:8 <b>patient'</b> 143:25 <b>patient's</b> 25:19,25 26:2 59:11,25 61:2 63:15,19 64:3	65:4 71:9,25 73:16 82:2 96:14 101:13, 15 109:8 112:11 113:14,20 114:3 117:5 126:9,25 137:7 145:1 152:6,11,15, 16,25 <b>patients</b> 14:2 16:1,25 17:1, 16 20:24 21:6 23:20 24:3 29:12 41:15 44:22,23 46:11 55:12, 22 56:22,23 57:9 58:10 59:6,16,19 62:22 70:16 71:24 72:1,2, 5,24 73:1,11 76:17 78:22 85:13 89:9 99:7,19,25 101:24 105:20,22,23 106:10 116:13 119:25 120:16 131:14,23,25 132:15 143:12,14 153:9,16 <b>patients'</b> 27:2 <b>PD</b> 51:17,18, 20 <b>peeled</b> 100:18 <b>Pennock</b> 67:8 <b>people</b> 28:6, 12,23 34:1,2 35:13,14 44:25 48:25 73:8 85:6 93:7 127:4 134:24	<b>people's</b> 25:8 112:20 <b>per</b> 14:25 118:13 <b>perfectly</b> 6:25 <b>performance</b> 127:14 <b>period</b> 115:10 116:12 <b>periods</b> 23:21 24:3 62:22 125:21 127:5 <b>permanently</b> 82:9 <b>permission</b> 36:25 <b>person</b> 6:11 7:21 9:16 18:2 24:25 26:18,19 39:13,14 47:1,2 49:4 64:8 73:7 93:10 100:17 103:12 114:17 116:7 118:17 140:5 150:8 <b>personal</b> 36:22 60:10 82:11 <b>personally</b> 60:4,7,10 75:25 76:9 78:12 79:22 81:2 92:18 93:17 94:5,17 111:15 122:1 125:25 126:11 153:9 <b>phone</b> 29:4 35:22 39:13 41:23 48:23 95:9 96:19 128:14 142:18 <b>phrase</b> 79:24 80:6
--	---	--	---

November 18, 2020

36

<b>phrased</b> 109:6	<b>plans</b> 17:6,9 135:16	<b>potassium</b> 32:23 137:15, 20	<b>private</b> 35:13
<b>phrases</b> 79:17,19 81:12,15 82:15	<b>play</b> 153:7	<b>practice</b> 18:14 58:12 116:10	<b>privately</b> 33:24
<b>physical</b> 17:5 58:12 59:20 61:9,16 62:14 73:17 76:14, 18 77:4,7,8,9 78:5,7 83:22 134:17 136:24 137:2,8 138:15 148:24 149:2,3	<b>player</b> 46:3,6	<b>practitioner</b> 68:9 105:12, 19 106:7,19	<b>probably</b> 18:20 22:20 34:4 52:21 56:6 69:15 70:1 74:14 104:15 143:6 155:14
<b>physically</b> 103:11	<b>please</b> 5:11 7:10,13	<b>practitioners</b> 105:21 109:21	<b>problem</b> 34:18 54:22 62:25 132:14
<b>physician</b> 14:20 36:24 64:18 68:18 71:13 72:15 74:7,16 75:7 83:5 104:25 105:1 112:15 152:5 153:16	<b>point</b> 7:16 12:1 27:19 28:3 30:25 31:21 34:14, 18 39:19 46:2 51:14 52:18 71:8,23 88:2, 16 91:14 95:8,9 100:5, 11 101:15,18, 19,22,25 102:2 103:8 114:23 118:12 127:24 139:10 144:22 146:2 147:2 148:4, 11 149:8 153:20 155:24	<b>preliminary</b> 91:16,18,20	<b>problematic</b> 58:2
<b>physicians</b> 65:2 82:13 115:11 151:10	<b>pointblank</b> 152:13	<b>preparation</b> 9:2	<b>problems</b> 21:13 132:23
<b>pick</b> 100:21 131:14,23 133:15	<b>pointing</b> 102:16	<b>prepare</b> 8:11	<b>PROCEDURE</b> 5:2
<b>pictures</b> 114:19 115:1	<b>poop</b> 119:4	<b>prepared</b> 8:5	<b>proceeding</b> 39:12
<b>Piedmont</b> 11:16	<b>poor</b> 47:25	<b>preparing</b> 130:9	<b>process</b> 133:6 135:7
<b>place</b> 61:20 89:14	<b>pops</b> 81:21 82:4	<b>presented</b> 120:6,12 131:5 132:17 135:9 136:4	<b>prod</b> 7:6 50:14
<b>placed</b> 89:16 116:20	<b>portion</b> 44:22	<b>pressure</b> 62:23 67:15, 20,25 70:5,9, 14,15 95:21 114:21	<b>profession</b> 31:13
<b>places</b> 90:3	<b>position</b> 11:11	<b>pretty</b> 31:3 66:10 120:17	<b>profile</b> 82:11
<b>placing</b> 151:21	<b>positions</b> 14:6	<b>prevent</b> 67:20	<b>program</b> 19:1 49:24 50:2 51:22 52:8 67:16 68:1 89:22 132:22
<b>plan</b> 76:5 78:23 80:18 84:12,14,16, 18 86:16 92:10 105:3 113:8	<b>positive</b> 9:19 39:23 42:13 75:18 77:15 80:21 90:12 114:14 127:16,23 155:1	<b>preventable</b> 119:24	<b>progress</b> 9:6, 7 78:18,23 80:14 117:7
	<b>possible</b> 98:1 143:18	<b>Prevention</b> 67:16 68:1	<b>progressed</b> 103:3
	<b>possibly</b> 119:23	<b>previous</b> 9:11 52:5 79:25 82:7 83:21 94:4 107:17 114:9	<b>progression</b> 111:7
		<b>previously</b> 81:24 82:4 117:23	<b>prolonged</b> 62:22
		<b>prior</b> 60:12 62:17 72:24 88:15 122:23 129:11	<b>prominences</b> 67:22
			<b>prone</b> 61:14
			<b>protocol</b> 111:21

November 18, 2020

37

<b>prove</b> 32:2 49:24 126:13	<b>quote</b> 6:16 36:6 75:24 120:25	100:20 106:6 107:19 117:8 118:13 124:16 139:20	<b>recent</b> 10:17 77:13
<b>provide</b> 6:7			<b>RECESS</b> 53:8 97:4 128:5
<b>provided</b> 6:4 30:22 84:17 134:7	<hr/> <b>R</b> <hr/>	<b>reason</b> 7:10 38:2,16 60:3 87:12 144:5 152:14	<b>recite</b> 6:17
<b>provider</b> 132:14	<b>ran</b> 16:24 21:4	<b>reasons</b> 139:5 152:21	<b>recognize</b> 33:1 70:2
<b>provider's</b> 76:6 94:10	<b>random</b> 105:21 106:6 109:14	<b>reassessed</b> 95:20	<b>recollection</b> 145:8
<b>pull</b> 53:14 75:14 79:24 80:12 146:23 148:6,13	<b>randomly</b> 15:17	<b>recall</b> 16:22, 23 21:10,14 22:21 23:6 30:21 34:10, 20,22 35:16 38:10 39:8 41:16,17 42:4 43:15 46:12, 19 48:4 53:14,16,19 54:10,24 58:8 59:20 61:2 62:11 69:14, 16 78:21 85:5 92:19 100:20 104:15,17 107:1 109:24 111:20 112:2, 3,4 116:19 117:1,8,16 119:13,18 120:19,21 123:1,5,15, 17,21 124:8, 10 125:23 126:17 127:7, 15,22,24 129:4,12 130:8,22 131:7 136:12, 20 139:20,24 140:10 141:13 147:14 148:20 154:17	<b>recollections</b> 127:18
<b>pulling</b> 77:2	<b>rapport</b> 55:25		<b>recommendation</b> 110:1
<b>purely</b> 132:1	<b>rather</b> 28:3 33:6 47:15 109:4 138:7 148:3		<b>recommendation</b> <b>s</b> 13:25 65:15 67:8,25 70:21,25 71:1,2,5 77:14,18 78:4 96:5,16 98:11 115:17 138:13
<b>PURSUANT</b> 5:1	<b>reach</b> 145:5		<b>recommended</b> 98:16
<b>pus</b> 118:14	<b>reached</b> 8:24		<b>record</b> 5:11 7:5 12:10 21:15,17 43:20 53:13 66:14 69:3 71:4 91:23 135:6 148:25 149:21,24 151:21 156:13,14,15
<b>put</b> 15:17 23:1 82:3 84:2 90:1,16 112:22 123:13,16 133:20 134:12 140:16 141:10	<b>reaction</b> 137:17		<b>records</b> 9:1, 4,10,15 40:21 66:13 79:5 120:8 122:24 129:23 135:10,19,24 136:1 152:6 154:22
<b>puts</b> 96:6	<b>read</b> 12:18 29:21 37:11 41:21 46:17 47:9 66:15 75:23 82:1 87:14 102:18 115:16 122:12 123:25 125:23 149:20 151:22 156:19		<b>rectum</b> 119:2
<hr/> <b>Q</b> <hr/>	<b>reading</b> 5:2 30:12 94:12, 21 97:25		<b>red</b> 25:9
<b>question</b> 6:23 7:2,9 9:8 29:22 39:20 40:5 51:3 60:7 97:17 109:6 116:8 121:6,11 139:24 156:16	<b>ready</b> 7:1 17:8		<b>refer</b> 141:15
<b>questions</b> 6:21 8:5 12:17,21 89:19 108:5 148:17 156:12	<b>real</b> 7:5 18:13 58:17 81:18 99:25		<b>referring</b> 43:22 98:25 148:9
<b>quick</b> 18:13 96:25 99:25	<b>realized</b> 98:12 103:21, 24	<b>received</b> 114:20 147:24	
<b>quickly</b> 83:13	<b>really</b> 10:11 21:2,10 23:8 29:3 38:24 40:2 42:4 43:11 50:24 51:8 55:16		
<b>quite</b> 18:2			



November 18, 2020

38

<b>refresh</b> 30:9	21,25 47:1,3	<b>remind</b> 45:13	<b>requesting</b>
<b>regard</b> 32:4	48:21 50:23	130:24	39:3
53:15 123:18	51:8,16	<b>Renee</b> 22:1,8,	<b>require</b> 23:20
<b>regarding</b> 6:1	53:22,24	13 27:7 50:7,	<b>required</b>
8:8 27:7	54:4,8,11,14,	12,22,24	134:14
38:11 55:21	21 55:5 56:8	51:1,5 52:9,	<b>research</b> 15:1
78:5 107:10	57:3,5 58:6	15 117:10	135:12
140:5	59:8,9 69:6,	122:22 123:9	<b>RESERVED</b> 5:3
<b>regardless</b>	25 70:1,2,6	130:10,18	<b>residency</b>
63:2	73:6 79:2	145:4,18,24	10:24 11:3,10
<b>regards</b> 13:9	84:24 85:9	<b>Renee's</b>	18:25 21:12
<b>regular</b> 16:21	93:14,22 95:3	50:19,21	33:4 49:23
19:17 72:8	98:4 99:2	145:17	<b>resident</b>
<b>rejected</b>	100:3,8,21,22	<b>repaint</b> 108:9	12:2,5,9
37:11 39:24	101:15	<b>repeatedly</b>	13:17,18
<b>related</b> 5:20	102:22,23	28:1	14:9,13,14,
135:24	103:1,2	<b>rephrase</b> 7:11	15,17 16:10
<b>relationship</b>	104:4,7,8,21	<b>report</b> 9:12	18:23 19:11,
55:14,17,20	106:24 107:3,	58:13 105:5	16 26:1 33:5
56:1,4 111:19	6,11 109:12,	116:17 119:20	36:23 38:18
<b>relied</b> 26:3	15,20 111:22	124:22 125:11	43:18,21,23,
72:4	117:17 118:21	132:4 133:23	24 44:9 45:11
<b>rely</b> 65:9,11,	119:10 120:3	151:15	49:9 50:7,13
14	123:2 124:5,	153:12,13	54:24 56:11
<b>relying</b>	7,14,16,20,	<b>reportable</b>	63:18 66:25
112:25	21,24 125:2,	154:6	68:15 72:18
<b>remember</b> 8:1	24 126:1,4	<b>reported</b>	74:11 75:11
11:20 15:20,	127:6 128:11	125:7 131:11	77:20,25
21 18:4 19:6,	129:18,21	132:3,6,8	78:15 83:14
9,12,14,22	130:16,17	134:4	84:11,24
21:11 22:2,9,	131:14	<b>reporter</b>	86:15 94:15,
12,24,25	136:10,12,17,	6:19,24	17 96:1
24:11,17	18,19 139:8,	156:16,20	105:18 112:15
26:8,12 27:1,	9,12,15,16	<b>reporting</b>	126:6 132:21
9,10,15,19,25	140:3,5,9	136:24	133:3,10,16,
28:13,16,17	144:2,3,12	<b>reports</b>	17,18,20
29:1 30:23	146:24 147:1	122:24	134:7,25
31:24 32:17	148:10,14,15	<b>represent</b>	135:12 142:9
33:19 34:8,	154:23 156:6,	5:19	145:5 152:5
17,25 35:18	7,8,10	<b>reprimand</b>	153:1
37:13,14,17,	<b>remembered</b>	33:20 35:7	<b>resident's</b>
18 38:12	141:11	<b>reprimanding</b>	41:23 79:22
39:22 40:19,	<b>remembering</b>	34:6	80:19 81:23
23,24 41:1,2,	118:11	<b>request</b> 37:11	83:9 84:13
18,20,21	<b>remembers</b>	<b>requested</b>	86:18 94:22
43:9,17,19	82:6	65:1 128:15	<b>residents</b>
44:13 45:19,	<b>remembrance</b>	135:24	13:4,9,21
23,24 46:1,4,	40:9 59:18		14:22 17:8,9
			19:15 20:8,9,

November 18, 2020

39

13 21:1 23:23 24:19 32:22 33:10 35:7 36:15 44:11 48:18 51:24 56:14 62:7 72:4 77:22 81:10 83:20 85:12 88:14 89:11 106:1 120:15 127:17 129:14 133:13 142:7 145:15 <b>Resources</b> 125:8,12,13, 15,19 <b>respiratory</b> 90:22,23 <b>respond</b> 30:6 49:6 101:9 121:11 <b>responded</b> 30:2 36:6 99:19 101:8 102:8 121:8 155:20 <b>responding</b> 31:17 42:12 <b>responds</b> 155:5 <b>response</b> 9:19 29:23 30:1 39:23 42:13, 24 75:18 77:15 80:21 87:17 90:12 114:14 123:13,18 124:19 155:1 <b>responsibiliti</b> <b>es</b> 13:2,8,24 <b>responsibility</b> 49:6 110:20, 22 111:8 112:16,21 113:1 149:16 151:14,18,22	<b>responsible</b> 64:14 111:1 112:22 152:25 153:2,7,16 <b>result</b> 91:24 <b>results</b> 91:14 <b>Retrospectivel</b> <b>y</b> 31:23 <b>return</b> 47:24 91:5,8 <b>retype</b> 82:5 <b>review</b> 9:1,4 25:19 40:21 41:4 65:9,17, 18 74:16 95:24 99:14, 24 115:10 122:14,24 130:6,11 <b>reviewed</b> 9:10 28:19 41:3 74:22 115:11 <b>reviewing</b> 97:8 <b>rid</b> 66:6 <b>right</b> 6:11 7:13 11:17,19 17:11 18:18 29:11,14 35:10 39:5,8 40:16 42:20 49:13,14 55:15 69:20 72:10 74:10, 12 80:10 88:3,10 89:14 93:9,14,20 95:1 98:18 99:12,16,22 100:2 101:16 102:1,7,8,10, 11 107:21 108:13,23 110:3,15 114:11 115:14,22 117:13 118:2 120:10	121:14,19 124:11 128:4 135:1 136:14 138:11 140:12 141:19 142:19 145:7 146:17 148:16 150:2 155:20,24 156:6,13 <b>risk</b> 114:21, 23 116:12 118:17 131:25 132:3,19,25 133:7,11 136:3 <b>Robertson</b> 66:17,23 69:19 89:6,8, 25 151:10 <b>Robertson's</b> 89:17,20 90:4 <b>role</b> 153:7 <b>Ronnie</b> 105:8, 11 106:21 <b>room</b> 13:12 17:10 28:8 33:23 37:15 38:17,18,22 48:10,21,24 59:25 60:23 61:8 63:15,20 64:4 66:3 72:3,12 73:9 75:12 76:13, 24 101:13 104:10,18 106:17 126:9 <b>rooms</b> 27:2 39:16 45:1 142:12 <b>rotate</b> 14:24 15:1 16:18 61:12,17 69:13 85:19 90:2 <b>rotating</b> 67:21	<b>rotation</b> 69:10 143:6 <b>rotations</b> 15:14 24:16 <b>round</b> 16:7 17:7 55:18 83:18 86:8 104:24 105:1, 2,4 144:6 <b>rounded</b> 72:9, 11 <b>rounding</b> 26:17 71:24 72:6,25 88:15 109:18 <b>rounds</b> 57:9 58:10,12 60:12 73:6 75:8 76:2 84:2 86:17 88:13 96:7,9 99:11,17 100:17 103:16 109:17 116:14 143:21 148:8, 12,13 151:4 <b>route</b> 119:4 <b>rude</b> 42:3 <b>rule</b> 61:1 <b>rules</b> 5:2 6:17 <b>run</b> 17:3,13 35:17,19 36:5,10,20,22 37:12,25 99:3 <b>running</b> 18:7, 19 39:25 40:4 99:20 <b>running-the-</b> <b>list</b> 26:6,9, 13 <b>runs</b> 39:9 <b>rushing</b> 51:17 <b>Ryan</b> 5:18 95:4
---	--	--	--

November 18, 2020

40

<p><b>s</b></p> <p><b>sacral</b> 9:8 22:6 60:13 61:14 62:24 64:23 89:10 96:17 98:17 99:8,10 100:11,16 103:17 107:16 108:21 116:13 117:18 129:5 130:2 133:22, 23 134:13 136:6 137:1 149:1 151:1</p> <p><b>sacrum</b> 70:5, 10</p> <p><b>said</b> 22:18 23:7,12 24:4, 8 25:8 27:10 28:4,9 31:17 33:21 38:1 45:14,23 48:7 50:17 51:14 53:25 55:5,6 57:8 58:7 62:8,11,12 72:1 76:22 81:2 84:2 87:10 92:18 93:17,19 99:7,9,10 100:10 101:18 103:9,19 107:6,16 108:2,8,14, 19,20 111:16, 25 112:5 114:6 117:17, 20 118:10 119:18 122:12 123:7,15 130:25 134:12,13 135:5 137:24 138:4,17 141:16,22</p>	<p>142:24 145:4, 10 146:2,23 147:1,7,12,24 149:15 150:22 152:14</p> <p><b>same</b> 6:25 12:12 14:21 15:22 16:24 17:24 37:24 42:17 45:3 58:14 69:10 79:14,18 80:5 83:22 85:13, 16 89:19 113:11,13 117:25 129:17 149:2</p> <p><b>SANTYL</b> 70:21 98:17</p> <p><b>Saturday</b> 17:24</p> <p><b>saw</b> 27:4 43:4 60:4,23 63:12 70:2 75:11 77:25 78:3 80:17 83:8 84:10 85:12 86:14 87:20 100:17 103:20 106:17 107:2, 14 109:13 110:14 114:3 117:7 118:6 132:24 138:12 151:3</p> <p><b>say</b> 7:13 12:10 14:4,15 15:3,25 18:1, 15,16,19 24:6,12,20 26:18,19,21, 23 27:16 28:1,3,5,15 29:7,13 32:3, 23 33:7,24 36:12 40:13 41:11 45:1 46:6,14 47:4, 13,17,22,23</p>	<p>48:8,9 49:9 50:9 51:20 52:15 54:8 60:9 61:5 64:19 65:8 67:24 71:5 72:14 74:20 75:6 78:1,4, 9,10 79:4 85:8 91:18 92:8 94:14, 16,18,23 97:22 98:18, 19 99:14,21 102:13,16,18, 24 103:11,12, 18 107:7,19, 22 108:7,11, 18 109:6 115:9 116:15 121:19 122:2 125:24 126:10 133:16,25 137:15,19,20, 24 138:1,3 139:14 141:13 145:5,12 146:1 152:4,8 153:5 155:6, 25 156:2</p> <p><b>saying</b> 14:12 23:1 34:20,22 35:1 40:3 54:12 59:18 62:1 76:9 81:25 91:24 93:13 94:5 96:16 103:24 109:1,4 116:3 137:4 146:4,5 150:20</p> <p><b>says</b> 39:21 44:3,17 68:3, 11,21 75:23 79:18 80:18 81:24 83:8 84:9,14 87:2 88:8 89:5 90:10,11,19</p>	<p>92:11,20,22 98:16 142:23 148:2 154:12</p> <p><b>scab</b> 100:18</p> <p><b>scale</b> 33:4</p> <p><b>scared</b> 32:24 33:14</p> <p><b>schedule</b> 16:21 106:4, 6,8 131:4</p> <p><b>school</b> 10:16, 18,22 11:9</p> <p><b>schooling</b> 10:17</p> <p><b>screen</b> 21:23 131:5 140:17, 21</p> <p><b>screenshots</b> 130:1,5</p> <p><b>scroll</b> 69:2 80:13</p> <p><b>scrolling</b> 77:6</p> <p><b>scrubs</b> 145:2</p> <p><b>second</b> 13:10 15:7 17:1 19:3,4,13 20:15 21:16 29:21 35:18 37:4 39:21 44:8 90:9 103:10</p> <p><b>seconds</b> 142:12</p> <p><b>secretary</b> 48:20</p> <p><b>section</b> 77:12 78:7</p> <p><b>see</b> 14:2,3 16:25 17:1,13 21:6,23 25:4, 9 29:23 30:2 36:7 37:5 39:20 40:11 41:12 42:5 43:14 46:18 47:6 49:20 50:2,19 51:9</p>
---	---	--	---



November 18, 2020

41

57:9 58:11, 17,19 59:11 60:17 61:22, 23 64:17 66:18 68:5 69:20 70:20 71:13 73:25 74:23 75:17 76:7 78:4 79:16 80:20 82:18 83:10, 21 85:19 88:21 89:10 90:11 91:24 92:7 94:5 95:21 97:16, 25 98:2,18 100:21 101:3, 25 104:2 105:22 106:9 111:2,8 112:24 114:19 115:3 117:6 118:15 121:6 122:5 126:23 127:1 131:22 140:19 141:17,18 143:8,14 147:25 149:1 <b>seeing</b> 24:10 37:17 57:9 58:9 59:5,16, 19,25 72:2 88:4 102:23 103:2 104:7 107:8 110:19 138:2 144:6 <b>seem</b> 7:13 12:17 39:8 101:16 115:22 127:6 142:4 <b>seemed</b> 37:17 143:18 144:8, 16 149:2 <b>seems</b> 29:11 31:3 146:6 <b>seen</b> 26:10 47:9 60:8,12	63:8,10 72:7, 11,17,20 75:11 77:22 85:10,23 86:1,19 88:17 89:7,15,19 90:6 101:15, 20,22 110:7, 15 114:4 117:25 122:8, 9 136:3 <b>sees</b> 64:23 <b>send</b> 22:19 56:2 91:1 <b>sending</b> 102:23 109:15 <b>sends</b> 74:14 <b>senior</b> 152:5 153:1 <b>sense</b> 7:10 <b>sensitivities</b> 92:2 <b>sent</b> 22:11,16 24:15,16 27:5 41:22 42:16, 18 43:12 96:15 101:14 102:3,5 107:18 154:10 <b>sentence</b> 90:16 <b>sentences</b> 54:1 <b>separate</b> 22:23 46:24 133:11 136:8 150:12 <b>separately</b> 142:5 <b>series</b> 67:19 <b>serious</b> 31:3 47:20 124:22 125:4 <b>service</b> 12:8, 9,11,12,13,14 13:16 14:8, 16,19 15:19, 22,25 16:1,6,	9,18,22 18:24 20:21,23 25:1,23 34:12,24 37:21 43:24 56:20 58:25 67:5 69:4,16 88:3,8 96:16 105:13 129:1 131:12 143:11 <b>services</b> 12:4,7 13:1 20:22 21:2,6 96:5 <b>session</b> 17:11 <b>sessions</b> 46:13 144:13 <b>set</b> 100:13,15 112:9 118:17 <b>sets</b> 97:21 <b>seven</b> 17:19 <b>several</b> 14:24 26:5 33:20 54:5 118:21 147:21 148:7 <b>sexual</b> 153:25 154:10 <b>sexually</b> 147:8 <b>shake</b> 95:2 <b>shape</b> 149:5 <b>share</b> 29:15 38:13 100:24 <b>shared</b> 56:6 <b>she</b> 43:23,25 44:7 51:7 52:12,18 66:24,25 67:1,2 70:4, 11 83:7,8,9 84:9 87:6,10, 11,20 90:5,6 95:16,20 110:10 122:12 123:15,16 124:5 129:17 130:21 146:19,21	147:1,4,11 154:20 <b>she'll</b> 55:17 <b>she's</b> 55:15 83:3 <b>shift</b> 19:24 37:1 49:5,13 141:19 <b>shocked</b> 103:3 107:12 <b>shortcut</b> 81:20 <b>shorter</b> 18:20 <b>shortness</b> 92:15 93:11 <b>should</b> 18:8 31:19 50:11 71:22 79:6 92:1 96:1,10 116:19,21 125:7 135:6 136:1 140:17 147:22 155:21 <b>shouldn't</b> 78:1 <b>show</b> 7:5 29:4 37:3 39:6 52:1 66:12 86:25 <b>showed</b> 47:4 144:19 148:17,22 <b>showing</b> 111:6 <b>shown</b> 59:23 135:10 <b>sic</b> 19:10 <b>side</b> 58:16 61:13,18 128:25 142:14 <b>sigh</b> 143:21 144:10 <b>sign</b> 20:25 81:25 144:19 156:19 <b>signed</b> 17:12 74:7 80:15 84:8 86:12
---	---	--	---

November 18, 2020

42

88:11 106:11 141:25 <b>signing</b> 5:3 79:22 87:20 <b>signs</b> 47:4 <b>silenced</b> 35:23 <b>similar</b> 73:10 81:25 86:13 <b>simply</b> 24:21 <b>since</b> 18:17 50:18 71:19 89:9 90:6 112:23 119:1 141:9 144:15 145:17 <b>single</b> 110:13 <b>sir</b> 6:8 <b>sit</b> 57:25 142:7 <b>sits</b> 120:14 <b>sitting</b> 8:23 27:14 48:23 <b>situation</b> 28:8 33:22 35:10,16 36:9 39:2 42:19 45:22 50:5 52:9 54:18 99:12 123:11 132:2,19 133:19 134:9 138:19,21 <b>situations</b> 38:19 48:1,22 108:4 <b>six</b> 73:4 <b>size</b> 103:7 104:20 149:5 <b>skin</b> 25:10 62:5 <b>skip</b> 18:13 82:17 146:11 <b>sleeping</b> 10:10 <b>slow</b> 95:6	<b>small</b> 66:16 <b>smaller</b> 42:5 <b>Smith</b> 18:16 <b>smoothly</b> 21:4 <b>so</b> 6:3,20 7:6,12,21 9:15 11:7,9, 25 12:3,21,25 14:24 15:7 16:8,13 17:25 18:5,16 19:2, 5,17 20:9,22 22:8,10,14 23:7,23 24:8 25:1,8,12,15, 24 26:5 27:14 28:12 29:3 32:25 33:9, 15,24 36:9,23 37:19 38:20, 24 40:2 42:11,16,18 43:8,15 44:15 45:13 46:11, 22 47:1 48:11 49:12,24,25 50:4,9,17 51:18 52:3,5, 11,19,23 53:1,2,5,6 54:1,15,23 55:13,20 56:21 58:3, 13,21 59:1,2 60:2 61:14 62:21 63:13, 23 64:2 65:6, 8,24 67:3 69:3 71:8,11, 15 72:1,4,10, 20 73:7,21 74:13 76:9,13 79:25 81:5, 12,15,22 82:1,4 83:7, 21,23 84:14 85:15,22 86:19 88:7, 12,18 89:8,	11,12,15,20 90:1,19 91:2, 12,13,23 92:15 93:6, 10,16,25 95:8,9,16,23 96:8 97:13, 20,24 99:8,13 101:20 102:3 103:6,15,18 104:8 105:3, 20 107:17 108:5,10 109:9 110:7, 9,12 112:12, 25 114:4,8, 22,24 115:5, 9,23 116:13 117:14 118:25 119:3 120:17, 19 122:7 124:24 125:14 126:1 127:17, 23 129:21 130:4,13,20, 21 131:4,23, 25 132:13,16 133:19 134:8, 22 135:4,19 136:3,5,7,16 137:6,18 140:17,22,23 141:5,10,19, 25 142:14,20, 25 143:6 144:7,14,19 145:12,17,21, 22,24,25 146:5 147:4 149:8,25 150:24 152:4, 14,17 153:8, 10 154:4 155:18 156:8 <b>soft</b> 61:23 <b>solely</b> 52:19 151:17 <b>some</b> 6:4 8:5 12:16 15:16	18:2 20:8 23:18 28:19 33:14,19 41:2 51:14 52:18 53:3 62:17 63:19 66:13 67:8 69:12 70:21,24 71:23 74:14, 15 97:18 99:24 103:6 106:9 108:18 110:20 111:7 112:1 120:8 126:11 127:23,24 129:25 130:5 132:24 133:5 135:6 139:10 140:4 144:5 147:2 148:11 151:25 153:25 <b>somebody</b> 36:19 47:19 61:7,17 85:20 100:19 114:11,12,18 124:22 134:10 154:12 <b>somebody's</b> 76:11 97:19 <b>someone</b> 64:22 115:12 <b>something</b> 7:13 18:10 22:19 28:2,3, 9,15 31:8 32:4,8 33:5, 11 35:12 36:15,20,21 38:8 39:3 41:25 45:25 52:7 55:15 61:23 63:13, 22 71:3 73:10 78:6 81:19,24 82:10 83:25 90:10 91:21 92:9 94:14
--	--	---	---

96:22 101:16 102:11 108:18 110:4 111:2 112:12 115:21 117:24 133:1 134:1,10,19 137:15,19 138:11 142:6 143:23 144:10 148:11 152:8, 19 153:9 154:11 <b>sometimes</b> 19:14 28:24 33:22 54:22 55:16 58:19, 24 63:5 64:18 69:13 133:24 142:8 144:12 <b>somewhere</b> 69:5 89:22 135:6 <b>soon</b> 144:14 <b>sooner</b> 112:9 136:7 148:3 <b>sorry</b> 9:21 35:23 40:17 41:7 45:13 60:9 108:1,11 109:7 119:7 131:2 <b>sort</b> 6:7,16, 23 7:25 8:6 18:22 19:25 20:17,18 27:15 33:19 50:14 51:12 70:22 74:14, 15 75:10 77:6 82:6 84:15,16 90:16 97:18 116:17 117:1 122:19 124:11 130:11 133:6 135:6 140:4 153:25 <b>sounded</b> 148:11	<b>sounds</b> 7:18 106:21 122:14 142:5 <b>speak</b> 8:8 22:22 45:13, 14 48:20 81:14 83:17 94:24 104:2 111:10 112:20 115:19 121:19,23 <b>speaker</b> 48:7 <b>speaking</b> 38:12 45:19 122:15 <b>specific</b> 20:23 26:24 31:24 48:10 54:15,21 56:8,12 59:8 75:3 91:6 119:8,10 127:18,20,22, 24 129:2,6 144:2 148:10 <b>specifically</b> 15:20 23:15 34:21 47:17 64:23 68:23 83:19 89:22 104:21 112:2, 23 127:2,15 150:13 <b>specifics</b> 16:23 41:17, 19 <b>specimens</b> 90:25 <b>spelled</b> 85:7 115:14 <b>spent</b> 73:4 <b>split</b> 21:2 106:10 <b>spoke</b> 22:12 45:15 <b>spoken</b> 112:1 <b>spot</b> 95:7	<b>spout</b> 108:4 <b>spread</b> 124:17 <b>spurred</b> 23:9 <b>sputum</b> 91:1 92:8 <b>stabblings</b> 16:3 <b>staff</b> 55:25 128:24 <b>stage</b> 64:13, 18 <b>staging</b> 64:9, 12,14 <b>stain</b> 91:24 <b>standard</b> 67:9,12 80:3 113:5,6,16 <b>standing</b> 27:1 53:22 54:4 <b>stands</b> 44:18 68:22 <b>start</b> 19:17 66:12 70:19 73:24 80:14 88:15 91:4 102:16 144:14 <b>started</b> 10:24 11:9,13 88:6, 7,10 102:2 133:6 135:7 155:22 <b>starting</b> 10:15 58:22 73:6 <b>starts</b> 69:3 153:12 <b>state</b> 5:10 10:20 74:16 <b>statement</b> 137:14 <b>statements</b> 33:10 <b>states</b> 65:18 <b>station</b> 53:22 54:5 109:16 <b>status</b> 61:9 73:16	<b>stay</b> 38:24 143:8 <b>staying</b> 46:10 145:23 <b>step</b> 146:5 <b>steps</b> 67:19 109:12 133:8 <b>stick</b> 104:6 <b>sticks</b> 27:2 <b>still</b> 45:18 112:19 116:5, 10 125:18 128:12 131:19 134:6 144:16 154:6 <b>stock</b> 81:6 <b>stool</b> 119:2,4 <b>stop</b> 35:11 153:4,5 <b>stopped</b> 37:22 <b>stopping</b> 95:8 <b>stops</b> 153:6 <b>stored</b> 82:9 <b>story</b> 94:19 128:25 <b>stuck</b> 26:16 104:7 <b>student</b> 57:8, 11 58:5,7 123:22,23 124:1,3,6 146:12,15 147:8 153:19 154:20 <b>students</b> 25:1,2 57:25 58:1,11,14 59:1 73:15 129:14 <b>stuff</b> 97:16 <b>submit</b> 133:13 134:21 <b>submitted</b> 134:5 135:22 <b>submitting</b> 115:7
--	---	---	--

November 18, 2020

44

<b>subparagraph</b> 143:15	98:9 118:19, 20 151:6	12 55:1 64:2, 6 94:19 108:9	19:7 20:3,12, 13,14,22 21:1
<b>subsequent</b> 43:15 117:1	<b>surgical</b> 11:1 93:23 103:6	124:23,25 129:10,13,20	26:10 28:25 29:10 38:25
<b>substance</b> 8:6	<b>surprised</b> 40:1,3	132:12 142:8 144:9 145:24	44:5 45:12 46:3,6,8
<b>such</b> 67:20 70:21 73:16	<b>suspect</b> 60:11	146:24,25 147:18	48:25 49:2 64:4 65:18
<b>sufficient</b> 62:2	<b>suspicion</b> 126:12	<b>talked</b> 22:18 39:19 43:10, 17 45:4,22	68:13,14,25 71:11 72:9, 11,14,18
<b>summarize</b> 83:13	<b>Swiss</b> 153:11	46:21 47:2 52:21 94:7	95:24 98:5 111:14 112:4
<b>Sunday</b> 17:24	<b>sworn</b> 5:6 6:7	102:4 112:3 129:16,18	113:1 134:23 136:23 143:5, 7 150:1
<b>supervision</b> 74:10	<b>system</b> 27:20, 23 28:5,13	130:24 141:16,21	154:24,25 155:3,4,6,7, 8,15,16,19
<b>supposed</b> 13:11,14 52:6 58:11 61:24 68:12 131:12	30:6 33:17 34:9 35:4 47:23 74:6 78:16 126:22 127:10	142:5 146:16 <b>talking</b> 14:17 17:21 33:25	<b>team's</b> 49:6 66:9 109:25
<b>sure</b> 6:16,19 7:7 8:15 12:11,20,22 21:4 23:24 34:14 41:8 43:7 47:12 48:4 49:25 51:5 54:17 68:9 76:12 83:23 85:5 92:13 93:4,8, 19,20 95:13 96:21 101:17 102:3,21 107:20 117:18 122:13 123:1 129:4 133:2 145:23	<b>systems</b> 126:22	42:8,18 43:16,17 44:2,12,24 46:19,23,25 52:13 56:19 60:25 84:23 89:2 93:20 99:24 100:3 107:21 111:18 117:9 120:24 127:11 130:17,22 139:22 141:5 144:1 155:12	<b>teams</b> 16:14 20:19 73:14 <b>tear</b> 25:10 <b>tell</b> 25:7,9, 17 32:15 33:3,6 36:14 53:23 62:3 70:11 71:16 92:5 111:3 115:6 118:13 125:20 128:22,25 134:10 156:5
<b>Surely</b> 114:25	<b>tailor</b> 91:5	<b>talks</b> 41:11 57:7 77:12	<b>telling</b> 26:4 34:17 54:6 99:8 116:2 146:8 152:17
<b>surface</b> 67:23	<b>take</b> 7:17 17:5 20:23 53:1,3 76:23 83:15 90:25 91:7 94:7,8,9 95:10 96:18 97:2 125:15 128:2 139:23 153:24 154:1	<b>task</b> 112:23 <b>tasked</b> 149:16 150:12	<b>tells</b> 96:6 152:19
<b>surgeon</b> 65:25 75:1 83:4 106:13	<b>taken</b> 5:1,22 46:12 53:8 91:15 97:4 128:5	<b>teach</b> 13:12 142:7	<b>tenure</b> 34:8
<b>surgery</b> 10:24 11:3 12:13, 14,15 13:3,7 14:18 20:20, 22,23 21:2 44:21 51:24 62:21 96:4	<b>takes</b> 24:25 83:16	<b>teaching</b> 108:6 131:21 136:13,17,20, 22 137:7	<b>term</b> 15:4 64:9 66:8
	<b>taking</b> 13:5 56:22 66:5 76:10 132:14	<b>team</b> 14:3,4, 5,6,7,21,22 16:5,7,12,16, 19 17:12,21	<b>terms</b> 90:17 <b>terrible</b> 10:13
	<b>talk</b> 8:11 9:16 17:4 18:1 24:18 33:5 39:20 43:2 46:18 49:19 52:10,		<b>test</b> 63:20,21 91:2

November 18, 2020

45

<b>testified</b> 5:6 9:24 38:10 62:8,16 71:15 115:5 122:4 129:24 137:9 156:9	<b>than</b> 6:6 7:19 13:9 14:2 18:20 23:1 24:25 28:3 31:10,20 33:7 34:5 42:18 47:10,15,16 50:11 73:8 80:17 81:1 98:13 103:21, 24 109:4 119:15 122:17 127:10 138:7 141:14 145:14 146:3 148:3 149:25 155:14	25 33:1,2,6, 7,11,14,18,19 34:3,13,20, 22,23 35:2 36:7,13,15 37:18,19,21, 24 38:7,10, 15,21,23 39:4,7,22,24 40:6,11,13, 16,18,19,22 41:12,15,16, 18 42:1,6,14, 17,25 43:14, 21 44:13,18 45:3,20,24,25 46:1,3,4,5,7, 8,10,12,17, 18,19,20 47:6,8,9,13, 16,18,20,22, 24 48:2,11, 12,25 49:3, 13,15,20,22, 24 50:1,17, 18,19,21,25 51:2,6,21 52:2,6,16,19 53:17,19,24 54:10,14 55:7 56:3,19,20, 24,25 57:1,8, 9,11,12,19,21 58:7,9,24 59:2,5,8,12, 14,15,18,21, 22,24 60:7,9, 11,20,23 61:1,2,5,6, 15,16,19 62:1,8,9,15, 16,18 63:12 64:5,11,15 65:8 66:1,2, 18 67:22,24, 25 68:5,7,14, 17,21,22,23, 24 69:20 70:4,6,8,9	71:3,4,15,16, 20 72:14 73:1,10,12, 17,25 74:7, 20,23 76:7, 11,17,18,19, 20 77:1,2,8, 9,12,16,19, 22,25 78:2,6, 10,12 79:1, 14,16,20,24 80:8,20 81:3, 6,12,13,24 82:4,10,12,18 83:8,10,14, 19,20,23,24 84:15,17,18, 19,25 85:14, 19 87:2,10, 13,14 88:3,4, 5,12,17,21 89:2,3,7,12, 21,25 90:6, 11,13,20,25 91:2,13,14, 18,20 92:3,5, 11,19,23 93:1,6,9,23, 25 94:7,8,9, 11,16,18,21, 23,24 95:3,21 96:13,16,18, 22,23 97:9, 14,15,16,19, 21,22 98:2,4, 10,12,14,18, 19,24 99:8, 19,21 100:5, 9,19 101:3,8, 14,17,20 102:2,4,10, 13,16,20,23 103:1,4,5,7, 10,21,23 104:5,9,13, 14,20 105:9, 21 107:7,9, 11,12,13,15, 20 108:5,7,
<b>testify</b> 128:20 129:8 154:15			
<b>testifying</b> 6:12 122:23 123:22 129:11 154:17			
<b>testimony</b> 6:4,7 25:15 93:17 111:25 149:12			
<b>tests</b> 61:25			
<b>text</b> 9:11,17 29:7,9,20 30:1 36:4 37:4,17 38:15,21 39:21 40:3, 19,21 41:2, 21,23 42:8 43:22 45:14 46:20,22 47:1,8,9 49:2 56:2,5 57:17 96:15 98:14, 15,24 99:13, 18 100:25 101:10,14 102:3,6,10, 13,18,24 107:17,18 108:21 109:15 128:8,10 129:23 130:1, 5 142:4 150:18,23 154:10	<b>thanked</b> 147:23		
	<b>that</b> 6:2,3,6, 13,17,24 7:9, 13,14 8:1,9, 17,22 9:10, 12,16,20 11:4,11,17 12:1,2,8,9, 16,17,25 13:13,15 14:12,16,19, 24 15:4,16, 19,20,25 16:8,12,13, 15,22 17:6, 17,21,24,25 18:2,6,19 19:13,19 20:5,14,24 21:12 22:7, 18,20 23:6, 12,13,17,20, 24,25 24:3,4, 11,13,21 25:15 26:1,2, 24,25 27:4, 10,12,22 28:5,10,11, 18,22,24 29:13 30:3,5, 18,22 31:3,21 32:1,8,15,18,		
<b>texted</b> 40:14 101:2			
<b>texting</b> 101:12 109:15			
<b>texts</b> 128:12, 13			



November 18, 2020

46

13,14,20	139:6,9,19	140:11 142:3	121:19 133:25
109:2,14,15,	140:3,6,10	143:5,12	134:10 142:8
18,22 110:4,	141:12,13,16,	146:4 148:2	144:7 147:3
10,17,23	17,22,25	150:1 151:24	153:12
111:2,15,17,	142:2 143:8,	154:11	<b>theme</b> 143:19
19,20 112:2,	13 144:1,3,7,	<b>their</b> 13:11,	<b>themselves</b>
9,10,16,23	14,22 145:8,	14 17:4 23:21	23:5 137:19
113:2,7,9,14	10,12,17,18,	24:5,20,21	<b>then</b> 6:22,25
114:1,3,5,7,	23 146:2,6,8,	32:23 37:1,22	8:16 9:7,17
16,20,22,23	9,12,14,16,	47:19 49:3	10:22 11:1,7,
115:3,5,9,18,	18,19,21	50:14 52:16	9,11 13:6,15
19,25 116:5,	147:1,7,8,12,	54:6 55:7	14:10,25 15:2
6,11,14,17	14,15,17,21,	61:9,10,12,	16:5,8,10,17,
117:11,16,18,	22,23,25	13,15,18	19 17:2,6,7,
19,20,21,22,	148:1,22,23	62:8,12,22	8,11,23 18:5
24,25 118:3,	149:8,9,10,	63:16,22	20:16,25
8,10,11,14,	14,16,20,24	65:15,21,22	21:1,3,5,7
15,16,22,24	150:4,8,18,	73:14 76:22	25:2,15 27:15
119:11,14,16,	23,25 151:6,	77:18 81:13	28:9 30:13,15
17,22,25	11,17 152:14	85:13 88:15	31:3,7 35:12
120:4,12,20	153:2,11,15,	96:5 106:4	37:16 40:5
121:2,5,6,8,	23,25 154:3,	112:25 134:24	42:1,24 44:8
11,12,16,20,	5,11,13,19	150:9 151:14	47:4 48:8,24,
21,25 122:2,	155:4,7,18,	153:2	25 49:1 50:7
4,5,8,15,17,	19,25	<b>theirs</b> 84:5	52:6 53:22
25 123:5,10,	<b>that's</b> 6:15	<b>them</b> 13:12,14	57:7 61:13,
11,17,22	9:14 20:2	14:2 15:8	17,20 63:13,
124:1,7,13,	29:11 35:24	16:7 17:10	21 64:4,7
14,15,18	40:13 45:9	18:13 19:1,2	65:14,15
125:3,6,10,	55:18 56:2	20:10,11 21:3	69:23 70:22
14,20,22,25	59:20 60:14	22:11,18,22	71:8 72:18
126:2,7,12,	62:1 65:14	23:1 24:12,	73:7,14 74:14
13,16,17,24	68:10 71:3	21,23,24	75:11 77:4
127:8,10,14,	73:18 76:25	25:7,9 26:21	80:6 81:5,16
19,23 128:19,	77:7 79:17	27:25 28:20	82:3,15 83:25
23,24 129:6,	80:25 81:4	30:20 49:3	84:1 85:13
10,15,17	82:9 83:4	50:14 51:15	88:7,11 89:16
130:3,9,12	84:3 87:14,15	54:15 55:8,	90:2,19,21
131:5,7,8,10,	88:3 89:10,18	11,13 58:20	91:1,5,25
15,23 132:13,	93:19 94:12,	61:8,12,15,20	94:20 96:6
14,15,16,17	18,21 97:21	62:7,14,19	99:9,18,19
133:3,6,7,20,	102:22,24	64:6 65:14	101:8 102:8
22,25 134:1,2	106:19 110:14	70:20 78:1,10	103:20 105:4
135:7,10,14,	117:7 118:25	85:14 86:8	106:2 109:17
21,22 136:2,	120:6,17	91:4 100:22	112:12 114:6
6,7,22 137:5,	125:22 130:21	103:16 106:5,	115:17 117:9,
9,13,23,24,25	131:19 132:12	10 111:10,12	11,23 118:22
138:2,11,14,	133:1,11,12	112:25 114:24	131:14,24
16,23,24	136:19 138:23	116:13 119:3	133:14 134:4,

November 18, 2020

47

13,20,21,22, 24 135:9,15 136:25 137:18 138:3,6 141:9,10,11 145:8 148:6 150:16 151:3 152:9,10 153:13 <b>theoretically</b> 16:17 18:5 <b>therapy</b> 73:17 <b>there</b> 5:16 10:13 17:13 19:23 23:24, 25 24:3,7,8,9 25:6,17,25 32:20 35:13 38:12,25 39:1,19 41:14 42:6 43:6,8 46:12 47:13 48:15,23 49:1 50:22 51:12 54:3,15 57:1, 2 58:14,21 59:15,16,21 60:1,20 62:4 63:1 65:17 66:7 70:9 71:6,16 73:7, 10 76:16,20 78:8,10 79:1 80:14 81:6 82:14 84:23 85:2 86:7 87:1 91:16 92:4,9,17 96:2 97:18 98:1,12 99:8 103:4,19 104:13,17,19 106:5,9,24 107:1,13,14 111:13 112:11,12 113:15 114:6, 16 116:11,15, 16,19,21,22,	25 117:20,24 118:5 120:8, 11,16 125:6 126:4,7,14 127:3 128:23, 24 131:4,19 133:5 134:23 135:4,5,6,10, 14,19 136:25 137:9 138:3, 4,9,14,16 142:13,23,25 144:5,7,8,10, 17,18 148:9, 23 149:4,13 150:11 154:19,24 155:10 <b>there's</b> 12:17 31:6,20 32:20 33:9 45:1 52:23 55:24, 25 70:24 71:2 77:12 97:24 99:9 105:20 106:1 108:6 115:3 118:16 137:23 138:17 153:8 <b>these</b> 22:23 48:22 53:3 55:1,7 56:20, 24 57:4 61:14 65:10 66:13 67:9,24 70:25 73:18 74:13 75:6,14 77:11 83:12,15 89:10 97:8 98:5 115:7 121:17 123:18 155:25 <b>they</b> 10:8 14:1,3,21,22, 25 16:4,6 17:2 21:1,5,6 22:9 23:4 26:19 32:23, 24 33:15	35:11 44:6 48:8,9 49:1 52:11,13,21 53:21,24,25 54:23 55:6,8, 12,21 56:2,4, 21 58:1,16,19 59:1,2 62:4, 23 63:12,20 65:15 70:19 73:22 74:17 81:10 83:23 84:1 85:14 89:9 90:2 91:2,15,20 92:15 97:9, 15,17,19 105:21,22 106:4,9 109:23 110:9, 20 111:2,8,16 112:10 113:2 116:12 119:4 121:20 125:7 133:24 134:8 136:2 137:16, 17,18 143:3,8 148:5 151:11 152:8 153:12 154:12 155:21 <b>they'd</b> 73:9 <b>they'll</b> 36:20 63:5 65:5 91:22 137:19 <b>they're</b> 13:13,22,23 32:19,24,25 33:14 55:13 56:21,22 58:23 64:7 89:9 90:25 111:1 121:17 135:21,23 143:3 155:16, 17 <b>they've</b> 33:14 110:23 152:10 <b>thing</b> 6:10 7:1 17:24	38:23 57:24 79:14,18 82:12 87:16 106:8 111:17 113:11,13 134:18 <b>things</b> 16:24 29:13 32:2,3 33:3,13,15 41:8 46:14 53:3,23 55:8 67:20 77:20 83:19 103:14 120:12 125:4 131:10 132:22 135:14 140:13 147:21 153:12,13 <b>think</b> 6:1 7:19 12:1 23:15 30:18, 21 31:2 34:3 40:25 46:22 51:18 52:3 54:21 57:13, 14 58:3 60:16 62:13 65:24 71:22 76:23 81:13 85:7 96:11,13 98:3,14 102:11 104:24 111:25 112:14 113:4,16 119:6 123:7,8 124:25 125:1 129:22 132:4, 8,16 135:2,5, 22 138:9 150:22 154:2 <b>thinking</b> 45:24 46:1,4 100:8 124:21 <b>third</b> 13:10 14:10 17:1 19:3,13 20:15 44:16 <b>third-floor</b> 126:6
--	---	--	---

November 18, 2020

48

<b>third-year</b> 13:18 16:10 <b>this</b> 5:1,24 6:2,7,10 7:21 8:4,8,12,20, 23 9:2 15:12 17:19,20,25 18:17 21:18, 23,25 22:2,4, 11,13,16 23:7,8 24:4, 10,19 25:16, 20 26:5,10, 12,18 27:3,5, 15 28:13,20 29:15,20 30:1,8,25 32:4 33:16 34:9 35:4 36:3,9 37:4, 5,10,13 38:13 39:6,7,9,10, 11,12,18 41:3,14,22 42:8,16,17 43:2,3,4,5,7, 10,15,16 45:14 46:1,4, 17,23 48:14 50:4,9 52:9 57:3,16,22 58:3 60:2 62:9,17 63:7, 8,16,25 66:2, 14 67:3,10 69:2,23 70:13,16 71:1,5,8,9, 13,19 72:7, 11,20 73:2, 23,24 74:5,19 75:7,16,17 76:2,10,25 77:1 78:3,14, 15,19,24 79:2,8,15,21 80:10,13,16, 17 81:5 82:24 84:7 85:10,22	86:19 87:1, 10,18 88:2, 16,17,19 89:1,5,16,24, 25 90:9,15, 16,17 91:12 92:14,20 93:22,25 94:4,6,21,23 95:15,23,25 96:8 98:3,6, 8,11 99:2,13, 23 100:3,4,5, 11,24 101:9, 15,19,21,22 102:2,9,24 103:5,10,12, 21 104:2,6 105:6,7,8,17 106:11,15,17 107:10,15,16 108:8,9,20 109:5,9 110:7,16,19, 20 111:4 113:4 114:5, 9,11,12 115:9,12,24 116:2,3,7,16, 18,20,22 117:3,14 118:18 119:6, 8 120:1,19, 22,23,24 121:2,20,21, 24 122:3,4 124:12,21,22 125:11,14 127:4 130:4 132:2,10,19 133:16,19,25 134:8,16 135:4 136:5, 7,10,18,21 137:12,13,22, 23 138:1,6, 19,20 140:18, 23 141:13 143:10,13,24	145:5 146:11, 14 147:8 150:4,8,13 152:12,13 154:16 155:18,24 156:17 <b>thoracic</b> 12:14 <b>those</b> 9:17 12:21 13:1 20:7 21:2,5 26:8 31:1,2 32:10 34:2 44:11 48:12, 19,25 51:19 53:20 56:23 57:21,23 61:24 63:1 70:18 71:5 81:11 89:19 90:24 91:7 103:13 116:13 120:9,14 126:22 128:12,15 130:1,25 131:13,25 135:19 144:13 148:20,22 154:23 <b>though</b> 32:24 34:15 40:13 51:6 53:25 65:24 70:2 78:3 80:8 85:6 90:6 104:16 108:5 114:8 135:23 139:9 <b>thought</b> 32:11 35:23 75:4 97:18 100:11 103:22,25 127:12 135:5 144:15 152:1 <b>three</b> 21:3 72:17 131:18 141:5 155:24	<b>through</b> 6:23 8:25 10:14,16 16:4 17:19,22 19:19 25:24 41:7 61:6 63:24 66:13 68:15,19 71:12 83:13, 23 96:3 103:23 110:16 111:5 115:16 118:21 128:3 131:13 133:15 135:13 140:22 148:19 153:13 <b>throughout</b> 17:14 55:13 126:24 143:19 <b>Thursday</b> 43:9 <b>time</b> 7:19 8:14 9:22 11:23 12:1 13:14 14:23 15:11 18:3 19:13,20,25 20:21 23:21 24:4 25:16, 20,24 26:8 28:4 31:25 34:19 35:18 38:3,6,7 39:3,8 40:6 41:14 42:17 43:3 44:14 48:14 50:3 53:3 56:25 57:1,2 58:14 59:7 62:17,23 63:7 67:21 72:3 78:14 81:5 82:5 85:11,19 88:3,16 91:11,15 98:7,8 100:13 111:13 115:9 116:12 117:4 119:14 124:12,13
--	--	---	---



November 18, 2020

49

125:21 127:5	32:4,8,18	70:2,5,11,14,	15,16,17,21,
133:1 145:11	33:5,11,12,	15 71:25	22 116:12,13,
150:25	16,19,20,23,	72:3,4,24	24 117:6,9,
<b>timeline</b>	24 34:13,18,	73:23 74:6,	10,11 118:3,
135:14	22 35:7,11,	15,16 75:6,9,	4,5,6,16,17,
<b>times</b> 8:11	13,17,18,20	23 76:18,19,	18 119:4,17,
19:22 26:6	36:5,20 37:3,	21,23 78:17,	22 120:12,22
32:21 33:9,21	11,20 38:2,7,	25 79:4,7	121:11,19,21,
35:14 46:12	13,15,20,24,	80:3 81:7,10,	23,24,25
56:9 58:21	25 39:3,6,8,	11,19,22,25	122:3,4,5,7,
63:1 65:17	10,18,24	82:5,16,17	21,23 123:12,
66:7 72:17	40:3,7,9,13	83:15 84:4,17	16,18 124:22,
76:16 92:4	41:4,9,11,24,	85:8 86:25	23,25 125:7,
106:1 119:19	25 42:12,16,	87:12,16	11,13,15,16,
126:4 145:23	24 43:3,10,	88:2,15,20	19,24 126:6,
148:7	15,16,17,22	89:10,14,18,	10,15 127:6,
<b>timing</b> 38:21	44:24 45:1,	19,22 90:8	16 128:6,14,
<b>tissue</b> 66:6	14,15,16,19	91:1,2,5,7	19,20,23,25
<b>to</b> 5:1,20	46:9,16,18,	92:5 93:3,8,	129:3,4,7,10,
6:6,11,12,17,	19,25 47:2,	14,20 94:3,7,	11,13,16,19
18,20,22 7:1,	10,11,22	13,18,19	130:3,11,17,
2,7,11,14,17,	48:7,23 49:2,	95:6,7,8,9,	23 131:6,12,
21 8:1,4,6,	3,6,10,15,18,	10,15 96:3,23	14,16,17,18
11,23 10:18,	23,24,25	97:5,7,10,15,	132:3,10,12,
19,22 11:1,2	50:7,9,12,13,	19,22 98:25	15,17,19,21,
12:6,11,16,	14 51:2,9,12,	99:3,7,12,13,	25 133:3,4,6,
18,21,22	15,17 52:6,	16,20,21,25	13,20,23,25
13:7,9,11,14	10,12,13,15,	100:8,14,15,	134:2,8,10,
14:5 15:1	16,20,21	24 101:2,9,	14,25 135:9,
16:3,18	53:3,9,15	16,17,18	16,24 136:16,
17:12,13,17	54:6,8,23	102:2,3,8,12,	19,23 137:12,
18:1,17,19	55:1,6,7,11,	15,17,18,20,	17,21,24
19:3,4,22	15,18,21,23	24 103:6,9	138:1,3,23,24
20:2,4,23,24,	56:16 57:8,	104:2,19	139:23 140:1,
25 21:5,6,12,	16,19 58:11,	105:3,4,5	7,8,12,16
18,25 22:8,9,	12,13,16	106:7 107:18,	141:15,16,21
11,12,18,19,	59:11,23	19,20,22,23,	142:7,8,13,18
22 23:1,13,	60:3,7,11,12	24 108:2,4,9,	143:8,9,18,23
15,23,24,25	61:1,4,7,8,	10,11,12,17,	144:6,8,9,17,
24:12,18,19,	10,11,13,14,	18,24,25	19,20,23,25
21,23 25:13,	15,18,23,24,	109:1,5,6	145:2,5,12,
24 27:3,11	25 62:7,8,9,	110:12,20,22,	23,24,25
28:1,2,3,4,5,	14,17,23	24 111:1,8,9,	146:3,5,11,
6,9,10,11	64:5,6 65:1,	15 112:1,3,5,	18,22,24,25
29:4,7,12,13,	8,9,23,25	8,17,20,25	147:3,4,6,7,
15,21,22,23	66:1,12 67:9,	113:1,8,9,20	9,13,18
30:1,6,14,22,	11,19,20,24	114:1,7,12,	148:2,6,7,9,
25 31:14,16,	68:8,12,24	13,16,17,18,	12,13 149:2,
18,21,22	69:2,15,19	19,24 115:9,	8,12,19,23

November 18, 2020

50

150:17 151:6, 14,15,22 152:5,6,9,12, 14,15,20 153:7,9,12, 13,20,25 154:3,6,11, 14,15,20,22 155:5,25 156:2,5,8,9, 18 <b>today</b> 8:16 27:14 32:23 83:9 116:10 137:16 140:6, 10 141:3,8 156:3 <b>toe</b> 61:10 <b>together</b> 14:23 15:15, 17,18 17:2 22:22 26:17 39:9 66:11 <b>told</b> 21:12 22:9 25:7 32:8 33:10 35:11 42:1 51:1 55:6 57:11,21 59:7 60:20 61:15 63:12,23 96:8 98:10 103:4, 10 107:13 109:19 113:14,19 117:18 119:12 121:21,25 122:5 123:16, 22 124:7 128:21 132:9 137:11,23 139:12 145:18,21 147:2,4 149:13 152:10 <b>Tommy</b> 6:16 8:24 30:22 93:1 96:19	<b>tomorrow</b> 22:19 99:11 100:12 <b>too</b> 7:3 11:5 53:2 72:15 123:20 142:8 155:20 <b>took</b> 10:21 60:2 122:21 <b>tool</b> 131:21 <b>top</b> 83:7 92:22 145:24 147:16 <b>topic</b> 134:2, 14 <b>topics</b> 83:24 129:2 <b>totally</b> 6:15 <b>touch</b> 61:23 <b>touched</b> 154:10 <b>touching</b> 61:25 67:22 147:15 <b>town</b> 150:17 <b>train</b> 95:7 <b>training</b> 13:4,11 97:10 110:24 <b>trait</b> 31:4 <b>traits</b> 127:13 <b>transcript</b> 7:6 12:18 39:7,11,18 120:23 123:25 124:9 <b>trauma</b> 12:13 13:5,6 14:8, 18 15:19,25 16:1,2,5,6,7, 9,16,22 17:16,21 25:23 28:8 33:22,23 34:11,24 37:16,21 41:25 44:22 56:20,22	58:25 66:24 67:5 68:13,14 69:4,16 73:12,13 74:25 105:12 134:23 143:11,12 144:23 <b>trauma/</b> <b>critical</b> 83:3 106:13 <b>traumas</b> 145:13 146:3 <b>treat</b> 92:3 135:17 <b>treating</b> 109:22 <b>treatment</b> 63:2 65:22 66:9 67:9,10 70:18 84:16 <b>tried</b> 35:13 142:7 147:3 <b>trouble</b> 31:14,18 47:20 <b>true</b> 12:4 40:14 126:16 156:9 <b>trust</b> 7:19 38:4,6,7 <b>truth</b> 137:11 156:5 <b>truthful</b> 80:9 <b>try</b> 7:17 33:12 46:9 49:2 101:18 144:6 148:2 <b>trying</b> 12:11 61:25 107:22, 23 108:10,17, 24,25 109:1 136:16,19 146:22 156:5 <b>Tuesday</b> 22:21 <b>Tuesdays</b> 116:11	<b>turn</b> 24:23,24 26:18 35:22 89:11 104:20 116:14 131:12 133:6 134:24 <b>turned</b> 26:21 93:23 104:6, 11 118:9 146:14 <b>turning</b> 104:14 107:8 <b>turnover</b> 103:15 116:10 117:19 <b>turns</b> 117:23 <b>twice</b> 8:13 15:18 72:21 137:22 <b>two</b> 5:17 9:17,25 13:5 14:10 16:10 20:18 24:2 51:15,19 52:2,4,5 57:14 81:1 82:17 85:5 101:24 103:13 106:5 107:13 109:5 131:18 150:11 <b>type</b> 6:25 14:5 65:12 67:13 81:7,8, 19 91:25 117:21 120:9 126:23 <b>types</b> 9:17 12:15 61:24 65:14 67:9 97:9 <b>typical</b> 19:25 71:1 99:6 111:21 <b>typically</b> 7:17 16:23 25:8 63:18 64:2,16 65:11,21
--	---	--	--

November 18, 2020

51

72:23 73:1,9 84:18 85:12, 15 89:24 91:3 92:7 100:21 110:4,11 115:18,20 120:6 135:12 <b>typing</b> 6:19 82:7	<b>under</b> 89:17 90:4 93:6 148:16 <b>undergo</b> 118:19,20 <b>understand</b> 12:16,22,24 47:23 108:25 <b>understanding</b> 28:16 101:17 108:23 <b>underwent</b> 118:20 <b>unfortunate</b> 62:24 <b>unfortunately</b> 32:21 83:22 <b>unique</b> 52:20 <b>unit</b> 48:20 62:21 <b>University</b> 10:20,22 39:17 152:17 <b>unless</b> 25:25 47:9 51:1 52:10,13 58:1 63:18 76:19, 21 78:21 106:7 113:14 115:21 152:18 <b>unprofessional</b> 37:18 127:12 <b>unstageable</b> 70:5,11,15 95:21 <b>until</b> 27:16 60:13 98:8 103:19 <b>untoward</b> 147:9 <b>untruthful</b> 32:11 33:10 <b>up</b> 7:5 10:16 13:25 15:10 18:10,12 21:2 26:5 28:4 33:4 34:14 46:2,3 48:23	49:1 50:1 51:7 52:1 53:14 54:6 59:9,23 61:20 63:10 68:15 70:16 71:12 75:14 79:24 80:12,13 81:21 82:4 85:14,16 105:22 106:10 118:17 131:16 133:13 134:19 136:8 140:13, 16 144:19 150:3,7 153:10 <b>up-to-date</b> 135:16 <b>update</b> 73:15 91:22 100:1 <b>updated</b> 72:5 <b>updates</b> 99:18 <b>upon</b> 15:14 18:10 65:9 <b>upper-level</b> 32:22 <b>upset</b> 38:16 47:14 103:7 107:18 <b>urinalysis</b> 90:22 <b>urine</b> 90:22 91:1 <b>urology</b> 19:10 45:10 <b>us</b> 10:14 13:5 36:20 50:8 51:6 52:10,13 96:6 111:3,12 144:11 153:12,13 <b>use</b> 30:5 33:16 80:6 81:6,12 82:14 <b>used</b> 6:10 79:24 80:1 143:23	<b>using</b> 15:4 98:2 124:10 <b>usually</b> 13:21 14:2,7,10,23 17:11 18:15 24:25 25:1 33:13 48:19 49:2 50:5 51:5 52:9 57:14 58:14 59:1 61:22 62:3 65:25 66:10 70:19 72:16 76:20 78:22 88:5 89:9 91:9,23 92:7,9 116:9 134:19 136:16 143:7
<b>U</b>			<b>V</b>
<b>Uh-huh</b> 9:19 39:23 42:13 74:24 75:18 77:15 80:21 83:6 90:12 114:14 120:18 149:11 155:1 <b>uh-huhs</b> 7:5 <b>ulcer</b> 9:15 17:25 23:9 31:20 60:14, 16 63:25 67:15,25 70:5,9,14,15 93:22 95:21 114:21,23 148:18 151:1 <b>ulcers</b> 62:18 67:20 <b>ultimately</b> 93:23 139:1 153:15 <b>UMC</b> 111:21 126:11 133:8 <b>UMMC</b> 5:20 11:4,7 36:24 <b>unclear</b> 27:16 <b>uncomfortable</b> 123:23 146:20,22 147:2,4,11 153:19,24 154:5,13,18, 21 <b>uncommon</b> 62:25 99:7			<b>value</b> 32:7 <b>varies</b> 70:19 <b>various</b> 152:21 <b>verbal</b> 24:13, 17 57:17,18 64:6 130:14 135:11 <b>verbally</b> 24:18 103:12 <b>verify</b> 128:16 <b>versus</b> 13:18 <b>very</b> 6:15,20 23:22 25:23 37:13,18 52:11,13 75:1,5 92:9 106:6 107:7 124:22 143:7 146:3,6 148:3,5,15 150:25 153:19 <b>violations</b> 5:20 <b>visit</b> 60:4

November 18, 2020

52

<b>visited</b> 59:11,14 <b>vivid</b> 107:7 118:10	14:18 15:13 16:12,21 17:8,14 18:2 19:10,12 20:14,22 21:3,17,20 22:7,16 23:8, 18,19,24 24:7,8,17,21 25:17,25 27:6,9,11 28:1,10,13, 14,17,20 29:17 30:12, 18,20,21,23 32:11,13,23 33:1,2,4,8, 18,20,25 34:3,5,11 35:10,25 36:5,13 37:7, 18,19,20 38:16,17,22, 23,24 39:2,7, 14,15,20,24 40:1,2,6,9, 16,18 41:14, 15 42:17,18, 21,24 43:3,5, 6,12 44:1,13, 15,17 45:6, 10,11,20,23 46:20 47:13, 14,19 48:21, 23,25 49:3 50:6,9,21 51:2,5,18 52:2,3,19 53:8 54:19,22 55:5 57:1,2, 8,11,13,14, 16,18,21 58:5,9 59:15, 18,19,21,22, 24,25 60:20 62:19,20 63:14 66:20, 24,25 67:1,2 68:11 69:7,	16,19 71:16, 25 73:21,25 74:2,5 75:5, 19 76:19,20 78:21,25 79:11 80:22 81:5 82:21,24 84:20,23 85:2,4,8,14, 22 86:4,22 87:4,8,24 88:5,23 89:1, 2,5,18 90:5, 9,21 92:14,17 93:5,10,13,25 94:24 96:15 97:4,13,18 98:4,21,24 99:3 100:19 101:5,8,17,24 102:1,2,11 103:3,4,5,6, 20,21,22,24, 25 104:3,7, 10,17,22 105:4,8,14 106:5,6 107:13,16,17, 19,22,23,24 108:8,10,11, 17 109:3,10 110:1 111:22, 25 112:9,12, 24,25 113:2, 6,7,8,15,19 114:5,11,23 115:21 116:16,17,25 117:11,19,20, 21 118:3,5,6, 11 119:11,18 120:1,3,7,20 122:14 123:13 124:1,4,5,12, 18 125:22,24 126:5,12,14, 16 127:5,8 128:5,23 129:1,17,19	130:2,3,4,14, 20 131:8 132:1,3,5,8, 10,13,14,17 133:3,4,14 134:9,13 135:1,4,6,14, 15 136:4,17, 21,25 137:13, 14,20,25 138:2,7,9,12 139:1,2,3,6, 16,19 141:7, 24 142:4,25 143:13 144:5, 15,16 145:23 146:6,16,18, 19,21 147:1, 4,11 148:23 149:4,10,13, 16 150:16,25 151:17,21 153:19,20 154:4,20,21 155:24 156:15,22 <b>wasn't</b> 24:10 28:9 46:3,15 49:19 52:19 59:5,16 66:25 76:10 98:8 99:9 100:13 106:8 118:2 131:25 132:13 136:3 138:4, 14 144:4,8 151:14 <b>wavelengths</b> 138:10 <b>way</b> 6:24 13:20 16:24 28:5 29:12 55:10 68:15 83:18 89:24 93:6 94:8,16 103:24 128:16 141:12 147:9 150:1 154:1
<b>wait</b> 91:5 145:1 <b>waiting</b> 55:18 <b>walk</b> 10:14 58:16 61:6 63:24 64:4,7 103:23 152:9 <b>walked</b> 63:19, 24 73:18 75:12 <b>walking</b> 63:15,17 64:3 66:13 73:8 <b>want</b> 6:20 8:6 25:13 30:14 41:9 45:1 79:24 80:3,6 81:22 85:8 90:8 93:20 95:6,15 101:18 103:9 108:9 133:23 137:17 141:15 144:17 146:11 156:17 <b>wanted</b> 23:23 28:10 33:24 62:7 81:7 88:2 93:3,8 101:17 107:19,20 114:24 121:23 124:23 129:7 144:8,17 146:24 <b>wanting</b> 61:1 144:9 <b>wards</b> 13:22 <b>was</b> 5:1,6 6:2,3 8:14 11:4,24 12:3	<b>W</b>		

November 18, 2020

53

<b>ways</b> 58:23 135:16	3,18 116:20 117:12,17,19 118:25 119:1, 3,16,19,21, 22,24 120:5, 16 122:17 124:15 127:10 128:15 129:18 130:22,24 131:7,15,23, 24 132:14,21, 23 133:22,24 134:2,4,19,20 135:15 136:7 137:18 138:6, 12,18,20 139:24 140:6 142:4 153:2, 7,10,17 155:12,18 156:18	17:20 33:21 34:23 40:14 72:8 89:11 90:2 106:2,3 131:1,2,11,17 135:22 147:22 <b>weekend</b> 17:23 <b>weekends</b> 13:5 15:17 85:18, 23 <b>weekly</b> 14:24 23:24 <b>weeks</b> 18:3 24:2 51:15,19 52:2,4,6,10 73:5 109:5 <b>weight-bearing</b> 73:16 <b>well</b> 7:5 9:16 13:12 25:1 34:3 37:13 38:3 40:1 41:10 52:16, 25 59:13 66:10 77:23 81:3,13 85:11 86:8 87:21 89:7 92:2 102:5,13 108:16 135:3 137:6 138:14, 22 140:25 143:25 154:15 <b>went</b> 10:18, 19,22 22:8 60:22 62:13 98:11 109:13 117:10 118:3, 21 129:22,25 132:10,21 138:5 140:21 145:12 151:6 <b>were</b> 8:22 11:7 12:1,25 13:1 15:18,22 16:9 17:18 18:6,23 19:7 20:10 21:12 22:23 26:4	27:1 28:8,18 33:19,23 34:1 35:14 36:10 37:24 39:1,13 40:5 42:8 46:12,23 48:15,18,22 50:6,22 51:19 52:5,11,13,16 53:21 54:15 58:1 60:25 62:9 69:10 71:23 73:22 76:13,16 81:1 84:15,23 89:2 90:8 93:9 96:11,17 98:5,11,12,24 99:14,24 100:18 101:12,23 106:7,9 107:21 109:1, 18 111:17 113:9 120:12 122:4 126:11 127:10,12 128:19 134:22 137:5 147:18 148:16 151:12 153:18 155:18 <b>weren't</b> 10:13 51:25 54:23 138:11 <b>what</b> 6:23 7:7 8:20 11:7 12:6,12 13:1, 8,20 14:5,8, 20 15:25 16:21 17:3 18:22 19:20 20:9 21:8 22:6 23:15 24:6,19 25:4, 8,9 26:3,15, 25 27:3,6,9, 22 28:17,22 30:9,12 33:18,25
<b>we</b> 5:18 6:1, 19,20 7:7,18 11:13 13:6,13 14:9,17,24 15:2,15,16,18 17:2,3,4,6, 12,16,17 18:8,15 19:14 20:1,4,21 22:5 23:19,25 24:25 25:23 26:16 27:1 28:7,8,12 33:19,22 34:14 36:21 37:24 42:6 43:19 44:24 45:3,22 46:13,20 48:17,18,22 49:2,24 51:22 52:1 55:11 57:14 60:25 61:12 62:9 63:20 64:2,4, 7,12 65:12 66:10 67:22 69:12,13 70:22 72:1,9, 12,16 73:12, 18 76:23 79:17,21 80:5,6,17 81:1 82:14,15 83:18,24 84:2,11,14,23 85:25 86:15 89:2,12 90:8, 25 91:1,4,9 93:8 94:19 97:13 99:7,24 100:8 105:20 106:6 107:6, 20 109:17,18 110:15 111:17 112:5 113:7,9 114:1 115:1,	<b>we'd</b> 48:19 <b>we'll</b> 9:16 15:12 18:1 29:15 53:5 97:2 99:11 100:9,12 <b>we're</b> 12:11 13:4,6,11,14 16:2 17:21 19:1 21:18 27:14 28:4 37:3 42:18 44:11 50:1 78:24 83:19 84:7 93:20 115:17 141:5 145:3 153:7 <b>we've</b> 49:24 52:25 110:15 111:5,16 139:22 140:9 <b>Wednesday</b> 20:1 43:8 131:1,2 <b>Wednesdays</b> 20:3,7 119:22 <b>week</b> 8:15,17 14:25 15:1		

November 18, 2020

54

34:14 36:12 37:3,14 41:20,21 43:19 44:13, 20 45:20,23 46:6 48:7,15, 17 49:22 50:21 51:20 53:19,24 54:2,9 55:4, 5,6,10,18 56:10 58:6 59:20 60:19 61:6 62:6,19 63:2,14,20,24 64:9,11,19,21 65:18,24 66:4 67:15,18 68:7 69:16 70:8 73:18,20 75:10,11 78:24 79:19 81:7,25 82:7 84:2,15,19 85:18 87:2 89:18 90:13, 17,24 91:18 92:5 93:19 94:11 95:23, 25 96:1 98:4 99:14 100:22 101:17 102:22 103:9,25 104:2,3,4,8 107:6,19,24, 25 108:8,19, 23 109:1,10, 11 110:15,25 111:1,3 112:4 113:2,10,12 114:19 116:21 117:6,11,16, 17 118:18,24 119:18,20 121:14 122:12 123:13,15,25 124:18 125:22,24,25 126:13 127:2,	12 128:22,25 129:2,7,18,19 130:16 131:18 133:9 135:15 136:1,16,17, 19,21 137:13, 20 138:20 139:4,14,22 140:9 141:1,3 143:2,14 144:1 147:1 148:1,2,8 149:5,6 152:10 156:9, 10 <b>what's</b> 12:22 19:24 41:25 70:18 75:2 78:22 115:6 118:23 124:8 135:22 142:2 148:4 149:23 155:3 <b>whatever</b> 7:10 16:4 48:9 80:3,5 82:4 87:12 135:17 136:25 137:3, 4 138:7 144:6,23 <b>whatnot</b> 101:9 126:2 <b>when</b> 6:3 8:14 11:11,22,24 12:10,25 13:6 14:4,15 15:3, 10,20,24 17:7 18:6,23 20:2 21:9 22:12 23:19 24:12, 18,19 26:16 28:24 31:25 32:3,21 34:8 36:12 37:16, 20 38:18 39:24 43:4,5 44:3 46:6,8, 23 48:6,14 50:2,22 51:20	57:3,5 61:5, 14,19 62:21 63:1,15 64:12,19 65:11,14,17 68:11,21 71:23 72:14 74:5,13 75:6, 12 76:13 78:14 79:22 81:11 82:1 83:12 84:14 85:18,19 88:5 90:3 91:18 92:11 93:17 94:23 96:1,2, 15 97:8,22 98:8 99:2,4,9 100:15,16,21 101:14 102:2, 18 103:19,20, 24 104:1,5,8, 10 106:4,17 107:1,2,12,14 108:6,25 109:2,9 110:19 114:4 116:2,20 117:7,9 118:3,6,9 119:16,24 120:4 124:7, 18 125:10 127:3 130:25 132:9 133:14, 16 135:9 137:16 139:6, 16 140:23 141:19,21 142:22,25 143:22 145:22 148:5,16 153:18,23 155:6,22 <b>whenever</b> 7:18 16:18 32:25 46:9 89:21 95:9 118:14	<b>where</b> 5:13 10:16 11:12 15:21 16:7 17:4 28:3 31:21 32:11 33:9,22 35:10,14,16 36:4 39:15, 19,20,21 41:11,14 44:21 48:2 54:18,19 58:21 61:25 62:1 66:7 76:16 77:4 80:14 81:2 87:20 92:4,17 94:5 100:25 104:25 105:21 106:1 111:14, 16 118:25 119:4 120:23 126:4,5 127:11 134:16 137:10,12 138:12 141:16 142:9,13 143:12 148:12 150:12 <b>wherever</b> 48:18 <b>whether</b> 6:9 16:25 32:7 59:25 74:16 97:10 109:23 126:15 <b>which</b> 9:4 11:15 14:10 21:1 28:16 33:3 48:21 50:5 57:11 61:14 70:10 77:13 82:1,17 87:8,9 91:25 92:2 99:24 101:23,24 102:20,21 109:2 111:3,5 114:11 117:11
---	--	--	---



November 18, 2020

55

119:23 142:4, 5 144:15 146:3 <b>while</b> 13:3 21:5 28:7 83:16,17 126:5 128:25 <b>Whitfield</b> 8:7,8 45:16 56:16 67:11 93:2,5 95:4, 6,13 96:21,25 112:17 114:13 125:16 128:4 140:1,7,12,15 151:24 152:1 153:19 155:22 156:13,17,18 <b>who</b> 14:5 19:6 20:6,12 43:20 44:2,6 45:6, 9,10,11,13 53:16,19 57:11 64:8, 14,22 66:23 67:8 68:11, 21,22 74:25 82:25 83:2 89:2 94:18 100:18 101:2 104:1,10,21 105:9,11 106:11,16 109:22 112:3 114:17 120:14 124:1,3 127:8 132:6 133:4 134:7 139:12 152:25 153:4, 19 154:20 155:6 <b>whoever</b> 17:23 48:22 50:1 51:25 58:1,5 90:21 133:18 135:1 155:8, 15 <b>whole</b> 15:11	<b>why</b> 22:4 25:22 33:16 47:14 79:17 89:10 92:23 93:1 96:13 105:17 113:18 118:5,6 122:7 130:22 132:8, 12,19 139:1, 2,3 144:11 <b>will</b> 7:17 19:10 24:2,6, 8,10 38:13 45:3 57:14,16 58:3,9 59:18 62:3,4 65:1, 16 70:20 73:23 79:23 83:20,23,25 84:24 85:2,4, 23 91:21 92:2 105:6,22 108:3 116:14 119:2,3 124:2,6,7 125:20 127:4, 9 135:12 144:4 146:12 147:2 152:11 <b>Will's</b> 59:5, 15 60:2 <b>with</b> 6:20,21 8:7,8 9:8 10:15 11:22 13:11,13,15 15:11 17:3,7 21:13 23:9 26:17 27:7 28:5,23 29:9 30:2 31:6,17 32:18 34:14, 18 36:10,13 37:15 39:2 41:25 42:3 43:18 45:7,20 47:15 48:20 50:1,8,10,23 51:7,23,24 52:1 54:7,16,	19,24 55:2,8, 12,13,14,17, 20,25 56:1,6, 10,11,25 57:3,25 58:3 59:2 60:19 62:17,19 67:25 71:20 72:6,19,24 73:7,15,18 74:17,22 75:4,11 76:4 79:8 80:18 83:9 84:10,12 86:2,8,14,17 87:19,21 90:9 93:15 94:22 97:9 98:6 100:22 101:2 104:6,8,10, 18,25 105:23 106:10,16 107:3,18 109:18,20 110:17 111:4, 13,19 114:16 117:2,14 119:9,13 121:8 123:3, 8,9 124:6,16 125:3,10 126:10 127:19 128:8,10,12 129:23 130:14,21 132:2 133:19 134:19 135:25 136:8 137:2 140:5 142:7 143:10,19 147:3,4 148:7,8,12 149:16 150:3, 7,12 151:20 152:10 153:4, 5,6,10,12 <b>within</b> 18:25 51:15 91:9 92:8 120:7	142:12 <b>without</b> 28:11 105:1 <b>witness</b> 5:3,7 35:22 53:4,7 93:8 125:25 <b>witnessed</b> 58:4 111:16 122:1 <b>WOCN</b> 68:4,9 <b>won't</b> 27:15 119:1 <b>wonder</b> 47:14 <b>word</b> 60:2 76:11 134:20 <b>wording</b> 80:5 83:22 <b>words</b> 153:23 <b>work</b> 11:15,22 15:11 18:14 36:6 46:11 55:7 58:17 66:10 72:8 81:18 113:4 126:10 140:18 144:20 147:23 148:5 <b>worked</b> 15:15 52:7 56:15,25 130:21 <b>working</b> 68:19 75:4 126:12 144:14 <b>workout</b> 144:13,24 145:1 <b>workroom</b> 126:6 <b>works</b> 20:18 89:24 150:1 <b>world</b> 32:19 58:18 <b>worse</b> 31:10, 12 103:21,24 111:8 <b>worst</b> 143:6
---	--	--	---

November 18, 2020

56

<b>would</b> 8:1,7 14:5,10,15,25 15:7,16 16:4, 6,7,15,25 17:1,2,7,9, 10,12,16,17, 22,23 18:5 20:3,6,12,14 21:5,6 22:14, 20 23:20,21 24:18,20 25:2,9,13 26:2,5,16,18, 19,21,23 28:15,23 29:7 30:5,9,17 31:2,6,10 32:7,18 33:1, 2,5,6,22 35:8,12,14 37:23 38:4,7 43:8,25 44:7, 8,15 46:13,14 47:14,18,20, 22,23,25 48:8,9,11,16, 17,18,23 49:1,2,6 50:2,7,12,25 51:7,22 52:1, 12,18 54:23 55:5,6 56:24 57:25 58:4 60:11 61:7,8 62:12,14 63:7,10,13, 16,21,25 64:4,5 66:2 67:3,4,13,24 68:14,17,19 69:4,5,12,13, 15,24 71:9 72:6,10,12,20 73:8,13,15 74:14 75:7,9 76:14,16,18, 21 77:1,2,8, 13 78:1,4,6, 9,12,22 79:1,	4 80:8,9 81:11,13 82:18 84:15, 17 85:10,19 86:1,7,19 87:3,15 88:3, 12,16,18 89:21 90:19 91:12 92:8,15 96:8 97:9,13, 14,18,19,20 99:23 100:5 103:16,18 104:13,19,24 105:2 106:9 107:5 108:13, 14 109:17,19 110:4,7,17 111:11 112:10 113:13 114:16 115:12 117:21,25 118:5,6 119:11 120:4, 6,8,11 121:12,17 122:8 125:3, 21 126:3,6,7 127:11 131:9, 13,23 133:13, 15,20,22 134:4,11,23, 24 135:2,15 136:2,4,6,20, 23 137:24,25 138:6,18,23 139:18 141:11,13 142:6,18 143:2,21 144:3,6,10, 12,23,25 145:5,18,22 146:1 149:9, 14 150:11,12 153:5 154:6, 13,22 155:19 156:18	<b>wouldn't</b> 31:17 34:2 47:13 56:5 70:1 78:10 81:11 91:14 107:22 110:12 133:25 138:18,20,22 154:3 <b>wound</b> 9:5,9 22:6 25:4,6, 17 26:9,19, 22,23 27:4 31:23 32:4 60:20 62:4 63:14 64:8,9, 12,13,14,17, 19,20,21,22, 25 65:4,9,11, 16,18,23 66:8,17 67:7, 12,13 68:10 69:19 70:20 71:1,16 76:20,23 77:12,13,14 78:4,5,8 89:2,15,16,23 90:3,4 93:5 95:17 96:4, 14,16,17 97:8,11 98:5, 10,11,13,16 100:5,12,16, 17,23 101:3, 16 102:21 103:2,4,7,11, 12,17,18,19, 20 104:2 106:17 107:9, 12,14,16 108:18,22 109:8,9,25 110:7,14,16, 25 111:3,4,5, 6,7,13,14,19, 23 112:8 113:25 114:2, 4,6,10,11,12,	17,18 115:1, 3,5,13 116:1, 3,4,8,13,15, 20 117:18,20, 21,22 118:3, 11,25 119:2, 3,5 121:3,5, 9,12,20 122:16 123:3, 11 124:11 130:2 132:13, 17 133:22 134:3,13 136:6 137:1 138:2,4,6,13, 16,18 149:1, 4,8 150:5,8, 14,20 151:20 152:13 <b>wounds</b> 16:3 23:21 24:5 25:3 61:14,18 62:13,24 63:1 64:23,24 65:10 89:10 97:9 99:8 100:21 133:23 135:17 <b>wrecks</b> 16:3 <b>write</b> 22:4,9 78:12,18,22 81:7,11,22 134:17 140:24 143:16 <b>writes</b> 83:7 <b>writing</b> 23:2 24:14 46:23 81:23 123:14, 16 <b>written</b> 54:3 81:24 82:4 83:14 117:6 142:2 <b>wrong</b> 23:8 32:25 45:25 64:25 71:6 83:25 <b>wrote</b> 54:1 78:19 79:14
---	---	---	--



November 18, 2020

57

127:1 140:23 141:20 145:9 150:17	35:12,15 36:8,11 37:6, 13 38:8,12 39:5,9 40:10, 12 41:13 42:7,10,14,15 43:1 44:19 45:5,8 47:2,7 48:13 49:8, 17,21 50:11, 16,20 52:8,18 53:12,18 54:17 55:3 56:17 57:10 58:5 60:3,15 61:3,22 63:3, 6,9 64:10 65:7,20 66:19 67:2,17 68:2, 6,16,19 69:1, 22 70:7,17 71:3,10,14,21 72:9,13,16,22 74:1,9,18,21, 24 75:9,13 76:8,12,15 77:4,17,24 78:8,13 79:6, 10,17 80:2,5, 11 81:4,17 82:20 83:1,6, 11 84:18 85:1,21,24 86:3,10,21 87:14,23 88:18,22 89:4,24 93:24 94:2 95:2,5, 19,22 96:10 97:12,20,23 98:20 99:1,22 101:4 105:10 106:20 108:4 110:9,18 114:19 115:2, 4,8 116:3 117:15 120:13,18 121:7 123:15	125:5,9 128:9,18 130:16 132:5 133:18 137:16 138:17 139:11 140:20 141:6, 13,18 144:21 145:20 146:4, 5,10,13 147:20 148:2, 21 149:11,18 150:15,24 151:2,13 152:22 153:17 155:2,21 156:1,7,11,18 <b>yesterday</b> 80:17 <b>yet</b> 59:17,23 101:20 <b>you</b> 5:10,13, 16,22 6:4,6, 16,18 7:1,3, 6,12,16,19, 22,25 8:5,7, 8,11,22 9:1, 4,10,18,24,25 10:2,4,14,16 11:7,11,12, 15,20,22 12:1,6,10,12, 25 13:9 14:4, 15,16 15:3,7, 10,11,20,21, 24 16:9,14, 15,21 17:20 18:5,6,13,22, 23 19:4,6,12, 20 20:9,23,25 21:8,9,11,12, 23,25 22:1,4, 12,17,22,25 23:7,12,13, 15,16 24:12, 18,19,20,23, 24 25:4,7,9, 13,17,19 26:8,12,18, 24,25 27:2,5,	6,14,19,22 28:6,7,16,17, 22,24 29:1,4, 7,20,21,23 30:2,14,15, 18,23 31:2,6, 13,16,17,21, 22 32:3,7,10, 11,13,15,22 33:3,4,5,6,7, 11,14,16 34:5,8,16,17, 18 35:1,4,7, 8,10,16 36:4, 5,6,7,9,12, 19,23 37:3,5, 11,14,24 38:2,3,6,10, 18,21 39:1,2, 6,8,12,13,19, 20,22,24 40:5,6,11,14, 20,24,25 41:4,12,16, 20,24 42:8, 12,16 43:2,4, 15 44:2,10,13 45:13,14,15, 18,20,24 46:6,7,9,17, 18,22,23 47:4,6,9,18, 20,22 48:1,6, 14,15,16 49:9,10,12, 19,20 50:3,4, 12,17,19,22 51:3,9,14,20, 25 52:16 53:11,14,16, 19 54:1,8,11, 18 55:1,4,14, 15,16,18,20, 21,23 56:1,2, 5,6,8,13,19 57:3,8,9,11, 16 58:3,6 59:4,10 60:2, 4,7,10,11,16,
<b>y</b>			
<b>y'all</b> 140:19 <b>yeah</b> 9:23 29:11 82:8 92:23,25 95:11 106:23 142:3 147:25 151:8 <b>year</b> 10:22 11:2 12:25 14:10,18 15:5,6,7 17:1 19:2,4,7,9, 12,13 20:9, 15,16 43:23, 24,25 44:1,8, 13,15,16 69:12,14 120:5 131:8, 15 141:1,3 145:15 <b>Year's</b> 106:3 <b>years</b> 5:17 8:2 9:25 10:3 11:7 13:10 51:16 73:4 81:16 85:15 141:5 155:24 <b>yell</b> 48:24 <b>yes</b> 6:5 7:6 8:10 9:20,21 10:1,5 11:6, 13,19 13:19 16:12,13 17:22 18:4,8, 11 21:24 22:3 23:11,14 25:14 26:7 27:21 29:6,9, 14,25 30:4,7, 19 31:5,9,12, 15,19 32:14, 23 34:4,7			

November 18, 2020

58

22 61:1,2,5, 7,9,10,16,17, 22,24 62:3,6, 7,8,9,16,18 63:2,4,7,10, 16,23,24 64:8,17,19 65:17,18,21 66:12,15,17 67:15 68:5 69:4,5,10,20, 24 70:5 71:4, 12,15,16,20, 22,23 72:6, 10,14,20 73:10,16,25 74:20,23 75:11,12,17 76:7,13,16,22 77:22,25 78:1,15,19 79:4,16,19 80:3,20,25 81:5,6,7,15, 19,20 82:10, 18,25 83:9,12 84:4,15,24 85:7,18 86:7, 25 87:2,21 88:12,21 89:15,19,21 90:11,15,16 91:18,23 92:1,7,9,19 93:1,3,22 94:5,8,11,19, 23 95:7,9,21 96:8,11,13,19 97:9,22 98:4, 15,18,19,24 99:2,6,13,14, 19 100:3,5,8, 15,18 101:1, 3,9,12,20,23, 25 102:5,8,18 103:1,5,9,10, 23,24,25 104:1,2,5,6, 10,13,17,18,	21,24 105:9 106:16,17,24 107:3,7,9,18, 19,20,21,25 108:2,7,8,9, 18 109:1,6,9, 11,13,14,20 110:17 111:15,22,25 112:2,6,14,19 113:4,12,16, 23 114:16 115:5,10 116:5,6,16,21 117:1,9,14,16 118:5,6,9,10, 13 119:6,7,13 120:19,25 121:1,6,8,11, 16,21,24,25 122:3,5,7,18, 23 123:2,7,8, 17,18,21,22 124:3,7,10, 18,21,25 125:1,3,10, 11,14,15,18, 20,24,25 126:2,7,11, 15,18,21 127:3,11,12, 13,18 128:8, 10,12,15,19, 22 129:2,6,7, 10,13,19,22, 24 130:6,9, 11,17,25 131:17,22 132:2,6,8,19, 24 133:5,16, 23 134:1,3, 10,13,17,22, 23 135:5,25 136:10,17,18, 20,23 137:5, 9,14,17,20, 21,22,23 138:4,9,10,20 139:3,6,9,12,	16,24 140:3, 4,8,23 141:10,11,15, 16,17,20 142:6,22 143:8,9,10,16 144:1,4,9,10, 11 145:4,5,8, 16,18,21 146:1,8,14, 22,25 147:17, 18,21,22,23 148:6,8,16, 17,20,23 149:13,23 150:3,7,18,25 151:3,9,15,22 152:1,11,19 153:15,18,23, 24 154:1,2,3, 5,8,9,12,15, 19,20 155:6, 23 156:3,5,8, 10,17 <b>you'd</b> 16:18 18:16 47:10 99:20 <b>you'll</b> 6:22 83:21 <b>you're</b> 6:22 7:12 12:8 14:12 15:3,17 28:25 31:14, 18 46:8 61:19 62:1 63:15 75:10 78:14 83:12 85:15 88:4 93:13 102:19,20 103:24 104:5 108:24 109:1, 2 120:23 124:10 136:13 137:4 152:6, 17,19,23 156:2,5 <b>you've</b> 9:24 30:14 50:13 54:2,9,18	56:10,14 66:7 109:4 111:15 156:9 <b>your</b> 5:10,22 7:3,7 8:1 10:14,16 13:2 16:21 21:23 23:9 25:15 26:6 29:4 30:5,9 38:18 39:21 40:9 42:24 59:4 60:25 61:16 62:19 75:11 78:5 81:15 82:7,11 93:25 95:7 96:19 98:4 102:18 106:16 109:10 111:25 112:6 116:24 124:18 129:23 130:6 134:23 140:8, 18 141:7 145:8 146:1, 18 147:9 148:1 149:12 <b>yourself</b> 30:23 69:5 82:11 <hr/> <b>Z</b> <hr/> <b>zero</b> 124:11 <b>Zoom</b> 6:10,11
--	--	--	---